

Exhibit 1

INITIAL DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS PURSUANT TO LOCAL RULE 16.1-6 U.S. PATENT NO. 7,356,482 - <i>APPLICATIONS IN INTERNET TIME, LLC v. SALESFORCE.COM, INC.</i>	
Asserted Claims and Limitations	Corresponding Elements in Accused Instrumentalities
<p>1. A system for providing a dynamically generated application having one or more functions and one or more user interface elements; comprising:</p>	<p>Infringing Instrumentalities</p> <p>Salesforce.com Inc. (hereafter "Salesforce") is a cloud computing company headquartered in San Francisco, California. The Salesforce website is located online at http://www.salesforce.com/. Salesforce customer relationship management (CRM) products include Sales Cloud,¹ Service Cloud,² Marketing Cloud, and ExactTarget Marketing Cloud.³ Salesforce application development platforms include the Force.com platform and the Salesforce1 platform.⁴ The Salesforce1 platform includes the Force.com platform.⁵</p> <p>The Force.com platform and Salesforce1 platform are embodiments of <u>a system for providing a dynamically generated application having one or more functions and one or more user interface elements</u>. The Salesforce1 platform uses the Force.com platform.⁶</p>

¹ <http://www.salesforce.com/sales-cloud/>

² <http://www.salesforce.com/service-cloud/>

³ <http://www.salesforce.com/marketing-cloud/>; <http://www.exacttarget.com/>

⁴ <http://www.salesforce.com/platform/>

⁵ <https://developer.salesforce.com/platform/>: "Building amazing apps for any device"

⁶ http://help.salesforce.com/apex/HTViewSolution?id=000187601&language=en_US: "Salesforce1 Architecture Overview"

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U.S. PATENT NO. 7,356,482 - *APPLICATIONS IN INTERNET TIME, LLC v. SALESFORCE.COM, INC.*Asserted Claims and
Limitations

Corresponding Elements in Accused Instrumentalities

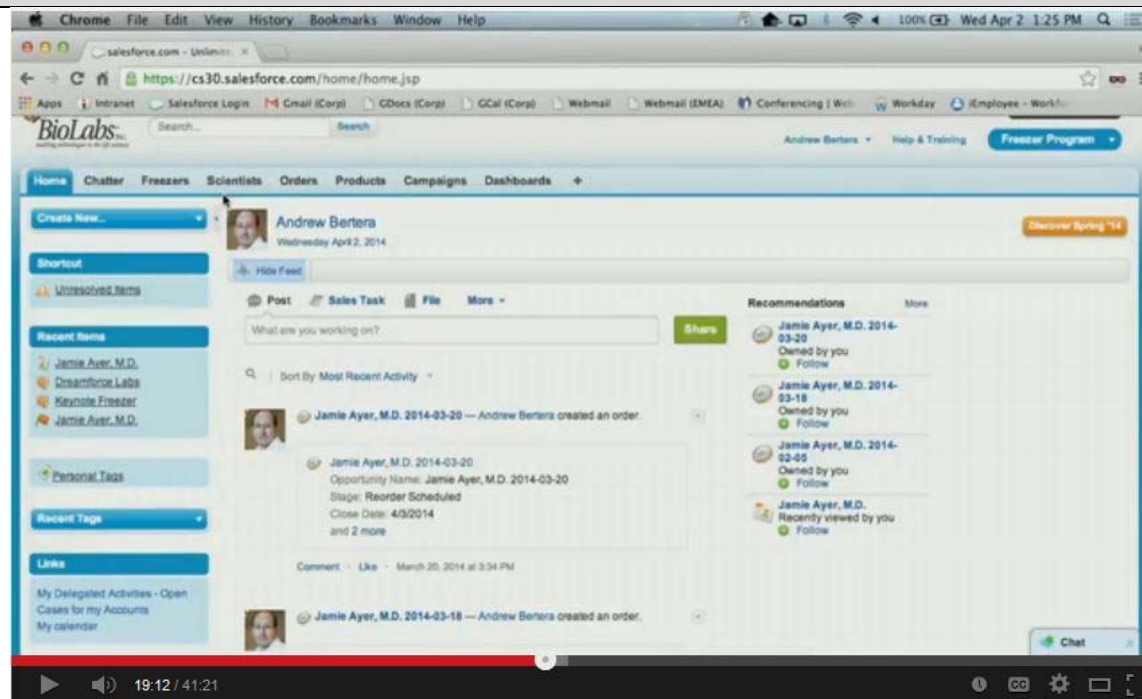


Figure 6. Developing a Third-Party Application on the Salesforce1 Platform⁷

The Salesforce1 platform is an application development platform that provides software development

⁷ Salesforce Video: "Salesforce1 Platform: Building Next Generation Apps, IT and Devices - Salesforce World Tour Boston" (<http://www.youtube.com/watch?v=AJJOHXZi3Mg>) at 18:29-22:15

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	<p>environments and tools, which help platform users develop and deploy mobile apps, desktop applications, and web-based applications.⁸ The Salesforce1 platform includes,⁹ among others, the Force.com platform¹⁰, the Site.com platform¹¹, and the Database.com platform¹².</p> <p>The Force.com platform is a cloud computing platform that enables its users to develop, package, deploy, and use software applications, including mobile apps, desktop applications, and web-based applications.¹³ Force.com users can use traditional development practices for creating on-demand applications.¹⁴</p> <p>A Salesforce or third-party application developed on the Force.com platform or the Salesforce1 platform (e.g., Sales Cloud, Service Cloud, ExactTarget Marketing Cloud, and Marketing Cloud) implements app logic (e.g., business logic), which is an embodiment of <u>one or more functions</u>.¹⁵</p> <p>The Force.com and Database.com platforms offer two approaches for implementing business logic for applications developed on the Force.com platform or the Salesforce1 platform: point-and-click and Apex code.¹⁶ Apex is the programming language of the Force.com platform. It allows the Force.com platform users to go beyond the point-and-click framework to add specialized and complex logic to applications developed on the Force.com platform.¹⁷</p>

⁸ <http://www.salesforce.com/platform/overview/>

⁹ <https://developer.salesforce.com/platform/>

¹⁰ <http://developer.force.com/>

¹¹ <http://www.site.com/>

¹² <http://www.salesforce.com/platform/database/>

¹³ [http://wiki.developerforce.com/page/About: "What is Force.com"](http://wiki.developerforce.com/page/About:_What_is_Force.com); <http://developer.force.com/gettingstarted>: "About the Froce.com Platform"

¹⁴ http://wiki.developerforce.com/page/An_Introduction_to_Force.com_Metadata: "Abstract"

¹⁵ http://wiki.developerforce.com/page/App_Logic

¹⁶ *Id.*

¹⁷ Salesforce Video: "Intro to Apex Code Webinar" (http://www.youtube.com/watch?v=J4yX17_yxbI) at 1:16-2:38

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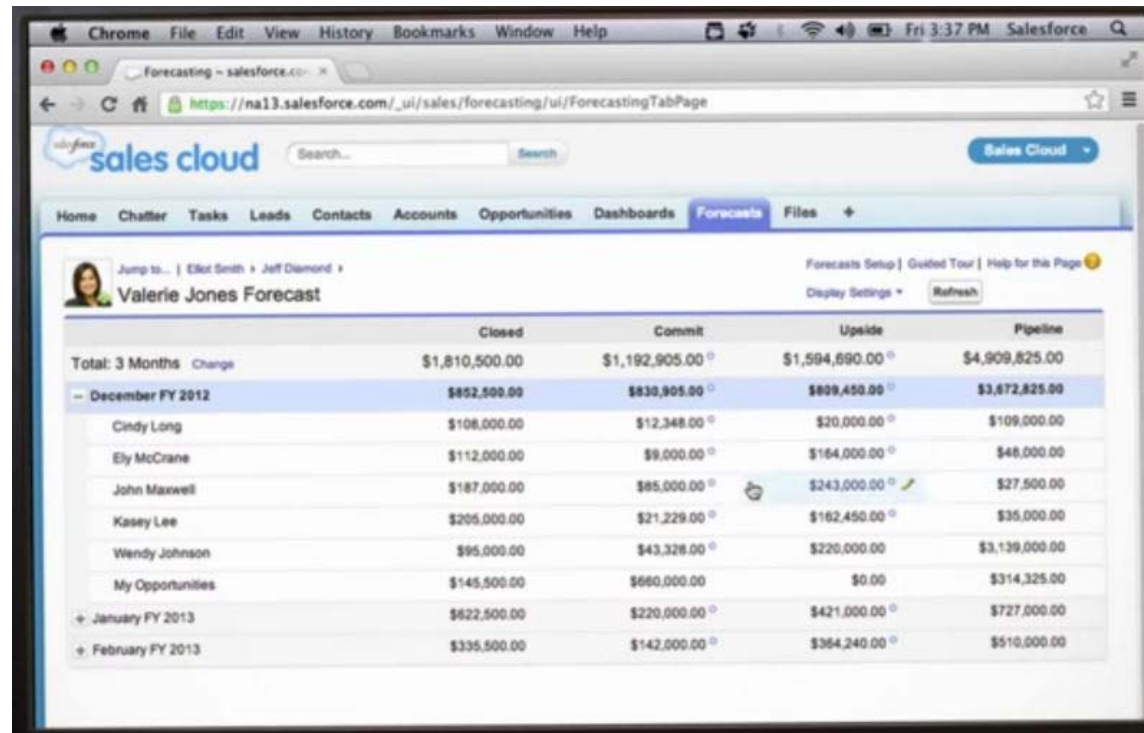
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Asserted Claims and Limitations

Corresponding Elements in Accused Instrumentalities

Direct Infringement

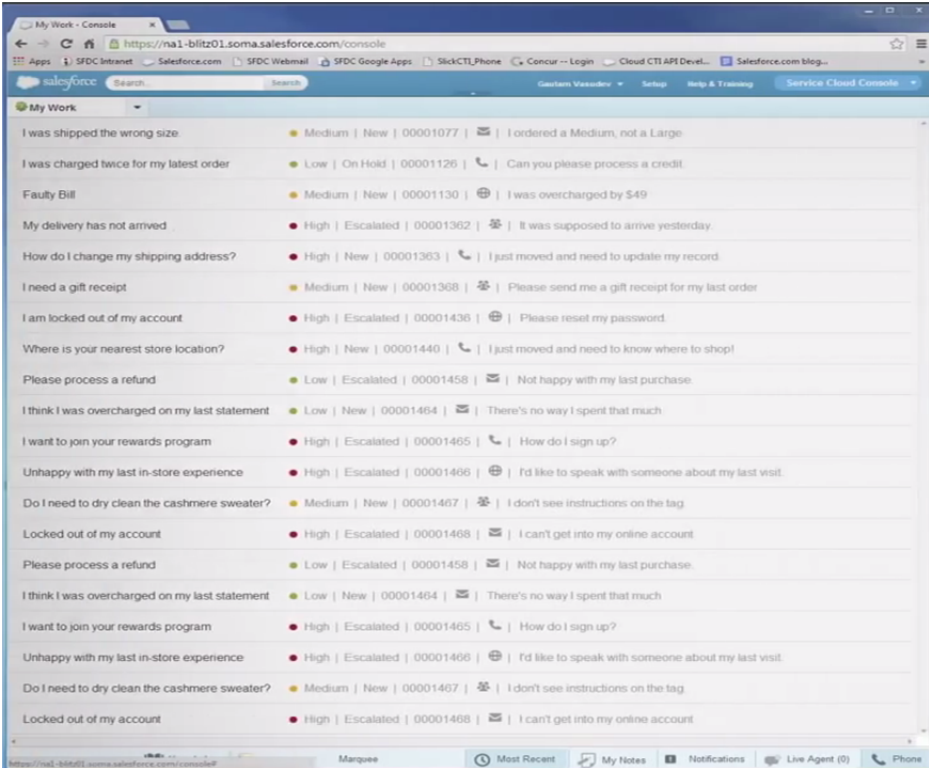
Salesforce's internal development, use, and creation of Salesforce products, including Sales Cloud, Service Cloud, Marketing Cloud, and ExactTarget Marketing Cloud, with the capability for access through a web browser on a user client computer constitutes direct infringement of Claim 1 of the '482 patent.



The screenshot shows the Salesforce Sales Cloud Forecasting interface. The browser address bar displays the URL: https://na13.salesforce.com/_ui/sales/forecasting/ui/ForecastingTabPage. The page title is "Valerie Jones Forecast". The table displays forecast data for December FY 2012 and January FY 2013.

	Closed	Commit	Upside	Pipeline
Total: 3 Months	\$1,810,500.00	\$1,192,905.00	\$1,594,690.00	\$4,909,825.00
December FY 2012	\$852,500.00	\$830,905.00	\$809,450.00	\$3,672,825.00
Cindy Long	\$108,000.00	\$12,348.00	\$20,000.00	\$109,000.00
Ely McCrane	\$112,000.00	\$9,000.00	\$164,000.00	\$48,000.00
John Maxwell	\$187,000.00	\$85,000.00	\$243,000.00	\$27,500.00
Kasey Lee	\$205,000.00	\$21,229.00	\$162,450.00	\$35,000.00
Wendy Johnson	\$95,000.00	\$43,328.00	\$220,000.00	\$3,139,000.00
My Opportunities	\$145,500.00	\$660,000.00	\$0.00	\$314,325.00
January FY 2013	\$622,500.00	\$220,000.00	\$421,000.00	\$727,000.00
February FY 2013	\$335,500.00	\$142,000.00	\$364,240.00	\$510,000.00

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Asserted Claims and Limitations	Corresponding Elements in Accused Instrumentalities
	<p>Figure 1. Sales Cloud Executing Within a Web Browser Environment¹⁸</p>  <p>Figure 2A. Service Cloud Executing Within a Web Browser Environment¹⁹</p>

¹⁸ Salesforce Video: "Sales Cloud Overview and Demo" (<http://www.youtube.com/watch?v=fadLk7-SPVA&list=PL50274E7562393953>) at 0:36

¹⁹ Salesforce Video: "Service Cloud Overview and Demo" (<http://www.youtube.com/watch?v=hwKFv9X1yhU>) at 0:52

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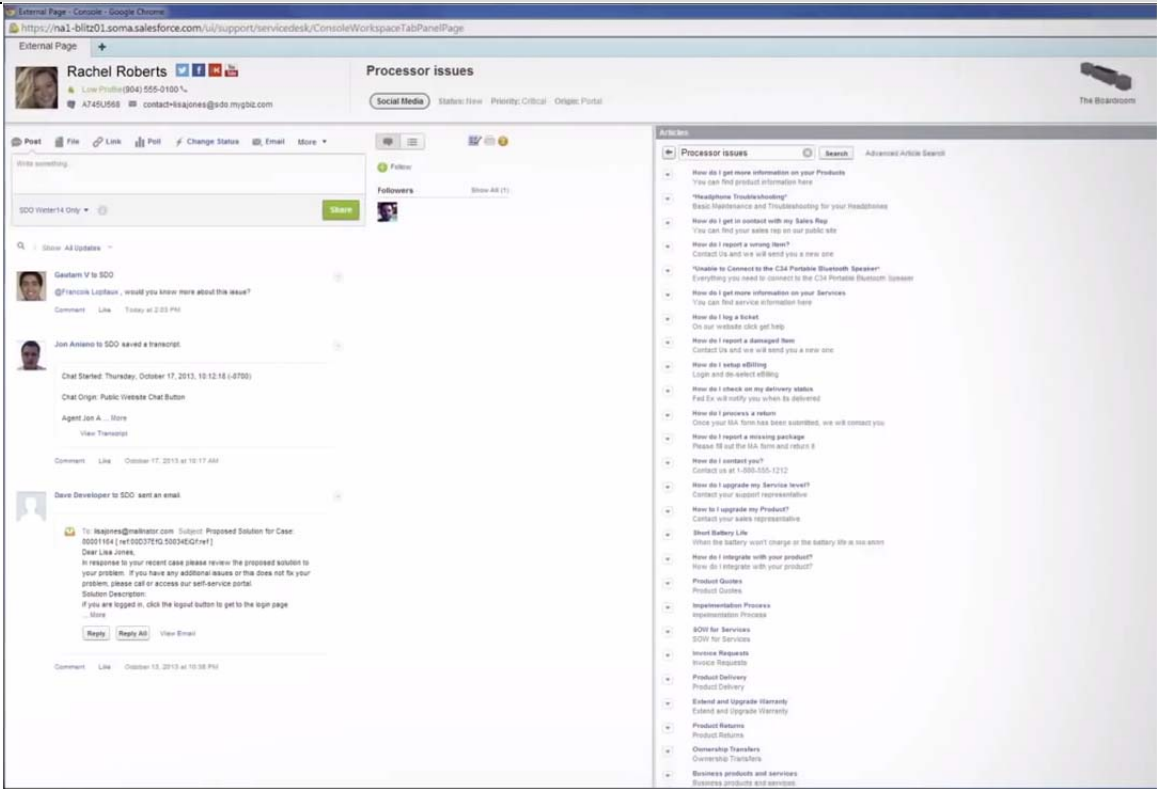


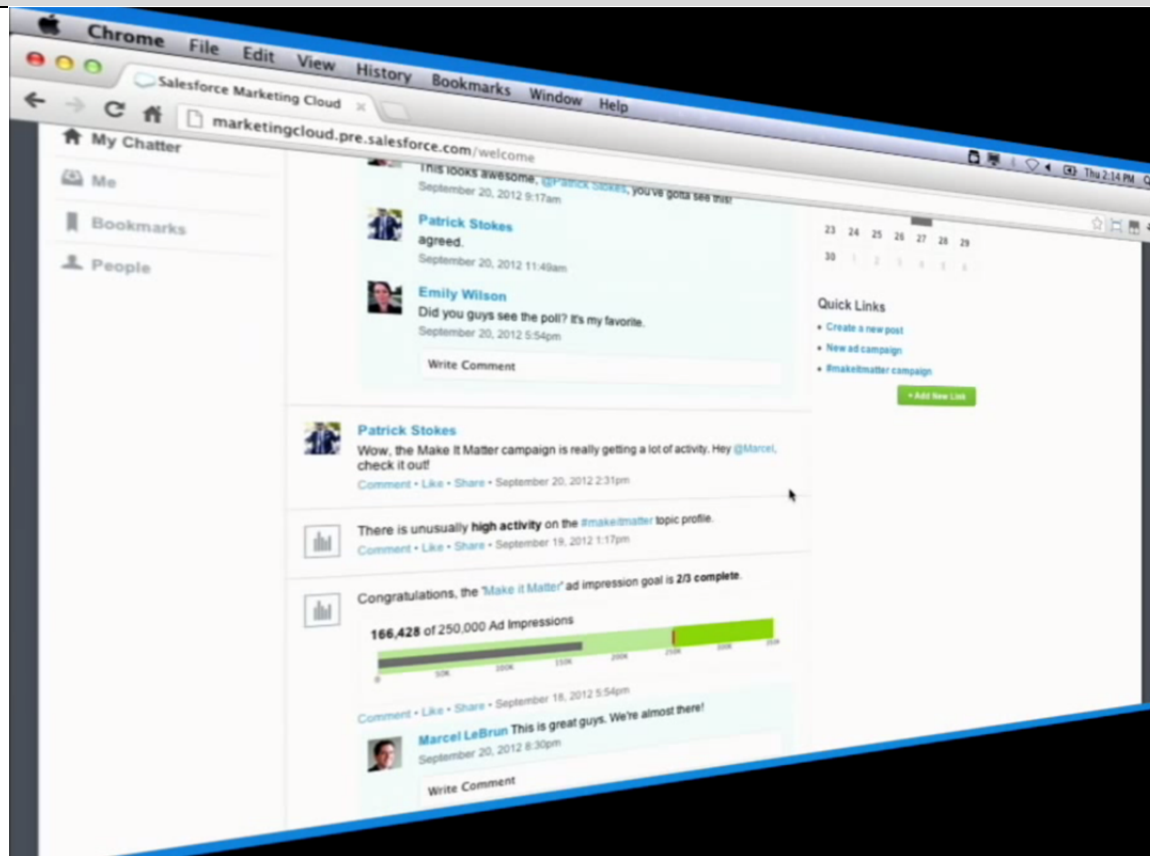
Figure 2B. Service Cloud Executing Within a Web Browser Environment²⁰

²⁰ *Id.*

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Figure 3A. Marketing Cloud Executing Within a Web Browser Environment²¹

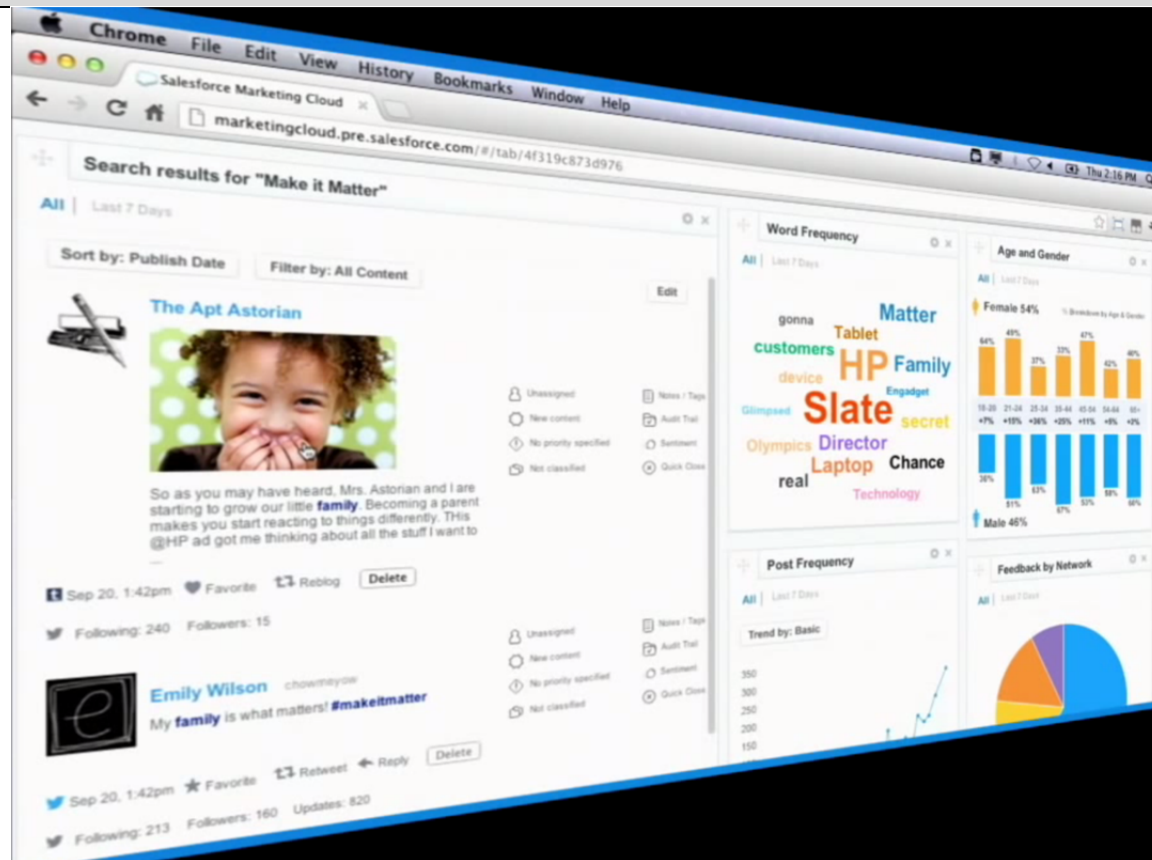
²¹ Salesforce Video: "Salesforce Market Cloud Demo" (<http://www.youtube.com/watch?v=6C7FYZvSKYc>) at 2:08.

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Figure 3B. Marketing Cloud Executing Within a Web Browser Environment²²²² *Id.* at 4:10.

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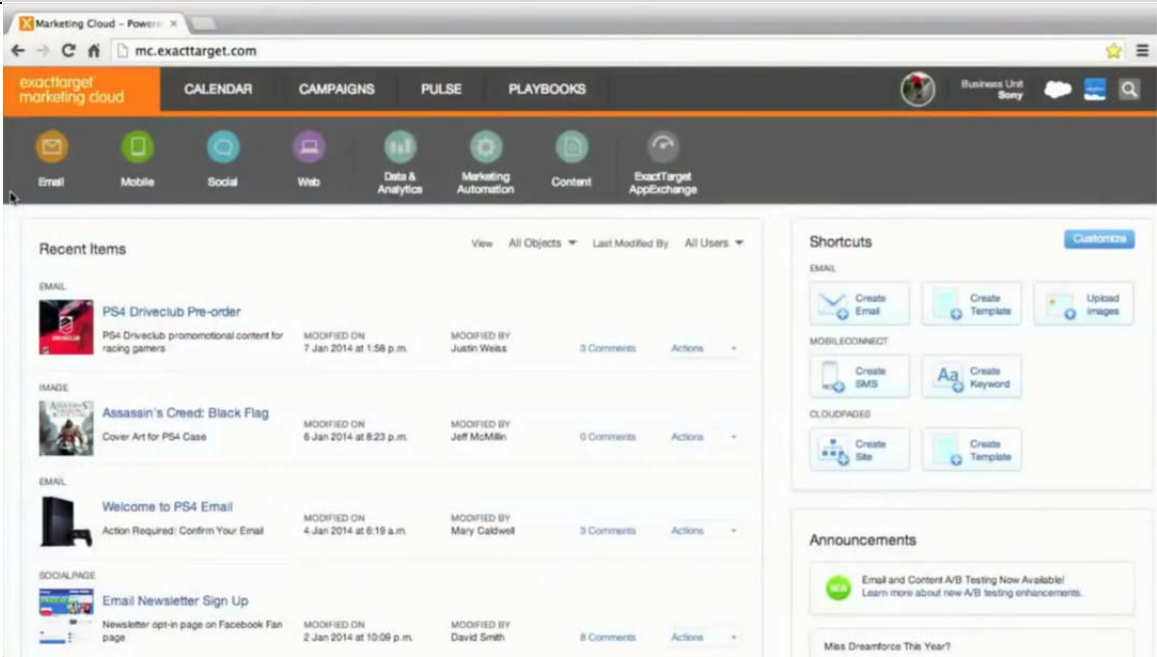


Figure 4A. ExactTarget Marketing Cloud Executing Within a Web Browser Environment²³

²³ Salesforce Video: "ExactTarget Marketing Cloud Demo" (<http://www.youtube.com/watch?v=ZpoIaIwF9eg>) at 9:07

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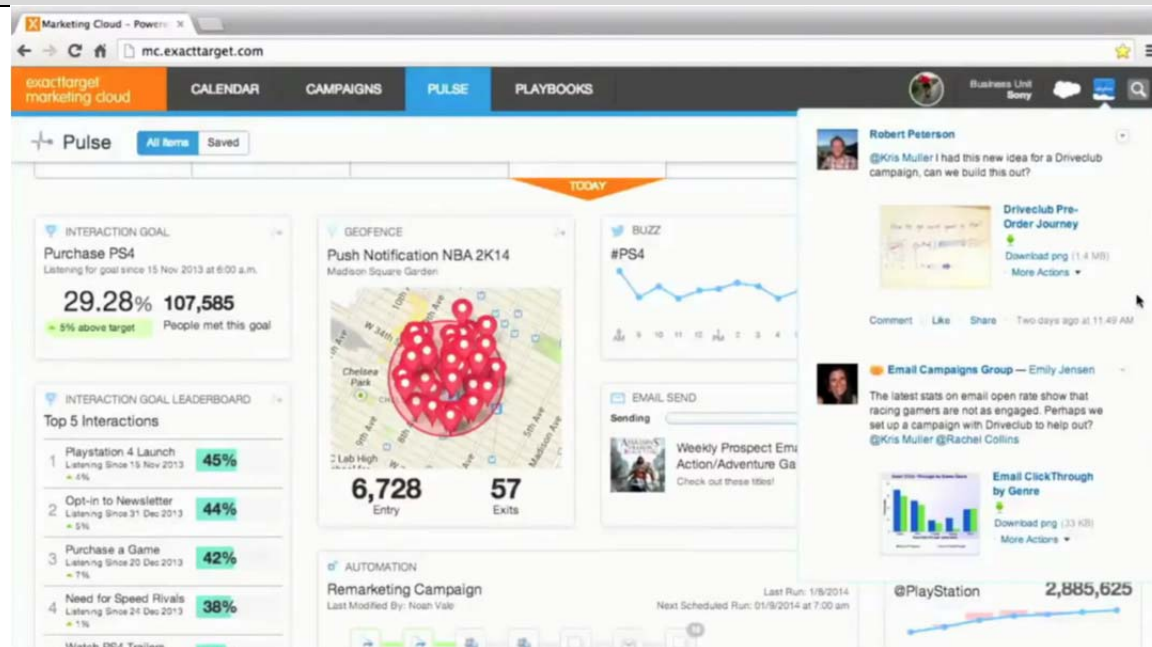


Figure 4B. ExactTarget Marketing Cloud Executing Within a Web Browser Environment²⁴

Salesforce's internal development, use, and creation of additional applications that utilize the Force.com platform and/or the Salesforce1 platform with the capability for access through a web browser on a user client computer constitutes direct infringement of Claim 1 of the '482 patent.

Indirect Infringement

²⁴ Salesforce Video: "ExactTarget Marketing Cloud Demo" (<http://www.youtube.com/watch?v=ZpoIaIwF9eg>) at 9:53

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	<p>By making Salesforce products, including Sales Cloud, Service Cloud, Marketing Cloud, and ExactTarget Marketing Cloud, with the capability for access through a web browser on a user client computer available to third-party users, and by promoting, providing training and instruction on the use and access to such third-party users, Salesforce induces infringement of Claim 1 of the '482 patent.</p> <p>By making the Force.com platform and/or the Salesforce1 platform available for the development, deployment, and use of third-party applications with the capability for access through a web browser on a user client computer available to third-party end users and/or developer users, and by promoting, providing training and instruction on the use, access, and development of such third-party applications, Salesforce induces infringement of Claim 1 of the '482 patent.</p>

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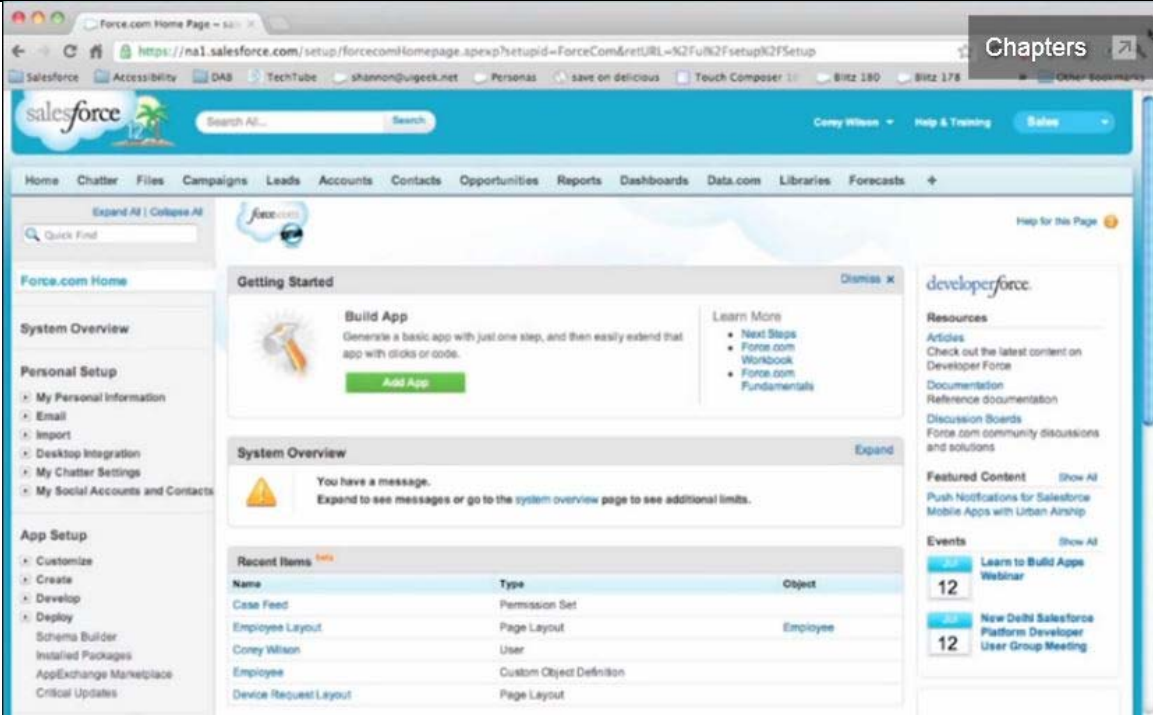


Figure 5A. Building a Third-Party Application on the Salesforce1 Platform²⁵

²⁵ Salesforce Video: "Learn to Build Apps Webinar" (<http://www.youtube.com/watch?v=2Bkbr-q00hs&list=PLF5C1A684ED0DD117>) at 7:35

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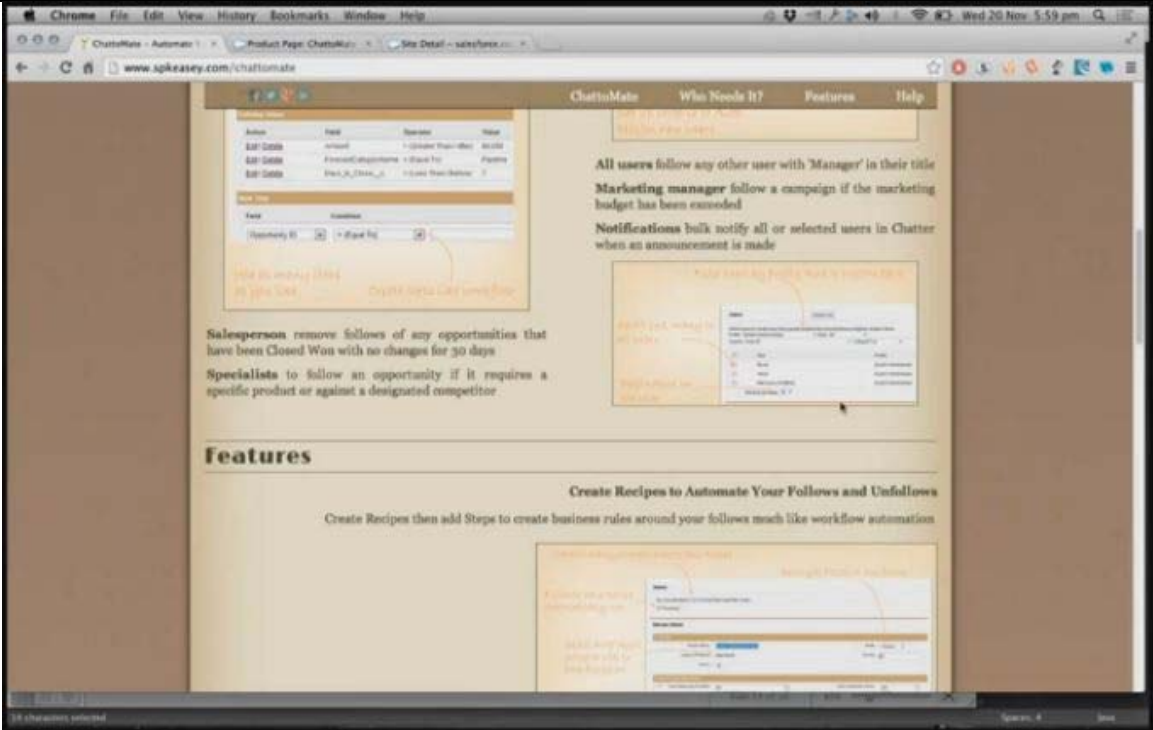


Figure 5B. A Sample Third-Party Application Executing Within a Web Browser Environment²⁶

²⁶ Dreamforce Video: "Developing Public Websites with Force.com Sites" (http://www.youtube.com/watch?v=icfkAeMf_e4) at 43:03

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Figure 5C. A Sample Third-Party Application Executing Within a Web Browser Environment ²⁷

²⁷ <http://wiki.developerforce.com/page/Websites>

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	<p>Salesforce's customers who have developed and/or deployed third-party applications on the Salesforce1 platform or the Force.com platform include, for example, Thompson Reuters,²⁸ Living Social,²⁹ Yamaha,³⁰ and many others.³¹</p> <p>A Sales Cloud user can customize Sales Cloud functionalities through the Sales Cloud user interface.³² For example, an Administrator user of Sales Cloud can (1) create queues, (2) create lead assignment rules, (3) create sales processes, and (4) create opportunity validation rules through the Sales Cloud user interface.³³</p>

²⁸ http://www.salesforce.com/assets/videos/sales-customers.jsp?videoId=ctQ6u1jXY0M&display_type=lb&contentWidth=790&contentPadding=30

²⁹ <http://www.salesforce.com/customers/stories/livingsocial.jsp>

³⁰ <http://www.salesforce.com/customers/stories/yamaha.jsp>

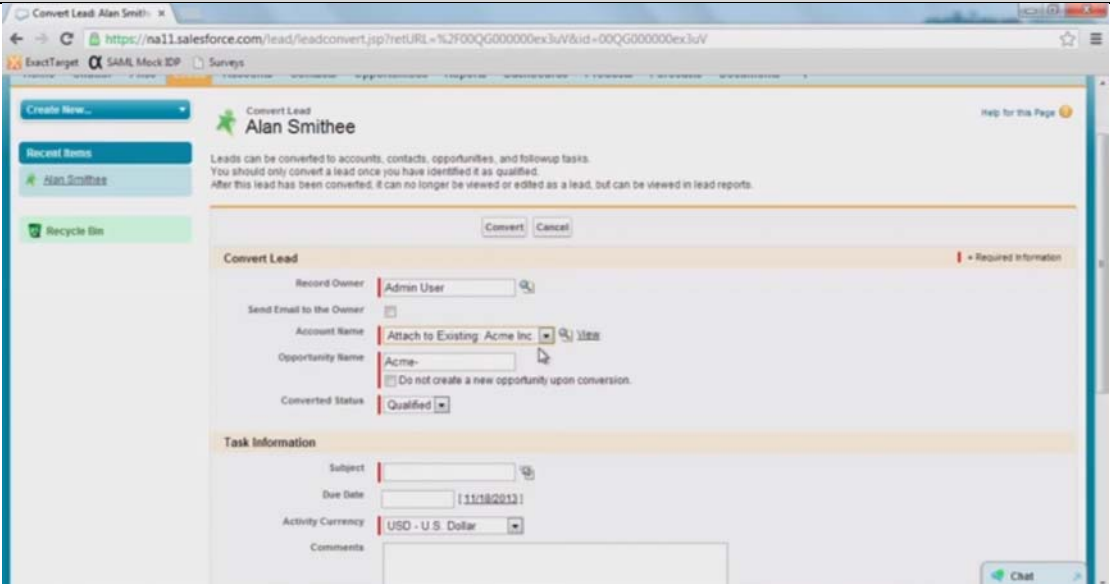
³¹ <http://www.salesforce.com/customers/>

³² Salesforce Video: "Opportunities and Quotes - Sales Cloud Demo" (<http://www.youtube.com/watch?v=JsxhG6d1YRs&list=PL50274E7562393953>) at 0:21-0:27

³³ Dreamforce Video: "Hands-on-Training: Get Started with Sales Cloud Administration" (<http://www.youtube.com/watch?v=MSp61khlP9s>)

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Asserted Claims and Limitations	Corresponding Elements in Accused Instrumentalities
	 <p>Figure 7A. Creating Lead Assignment Rules in Sales Cloud³⁴</p>

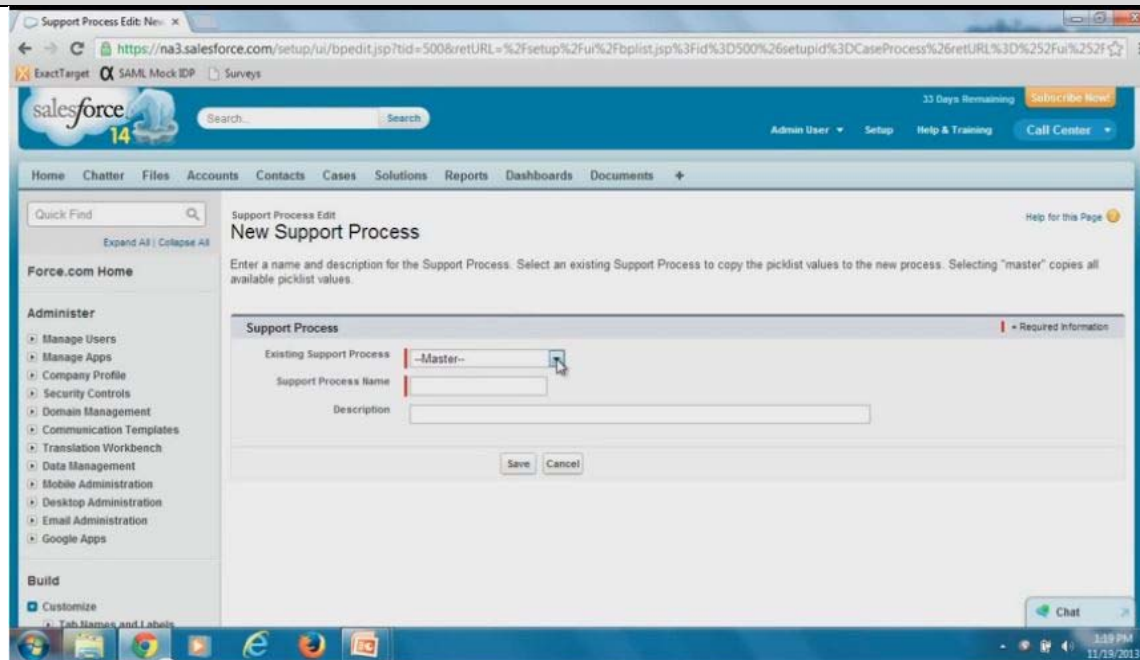
³⁴ *Id.* at 17:42

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Figure 7B. Creating Sales Processes in Sales Cloud³⁵

A Service Cloud user can customize Service Cloud functionalities through the Service Cloud user interface. For example, an Administrator user of Service Cloud can (1) create a support process, (2) configure web-to-case, (3) create a case queue and an assignment rule, (4) create a case escalation rule, and (5) create a workflow rule on a case object through the Service Cloud user interface.³⁶ The Service Cloud user interface includes a "Customize" area for customizing Service Cloud

³⁵ *Id.* at 29:18

³⁶ Dreamforce Video: "Hands-on-Training: Get Started with Service Cloud Administration" (<http://www.youtube.com/watch?v=fJFIqtlscI>) at 0:21-0:27

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functionalities.

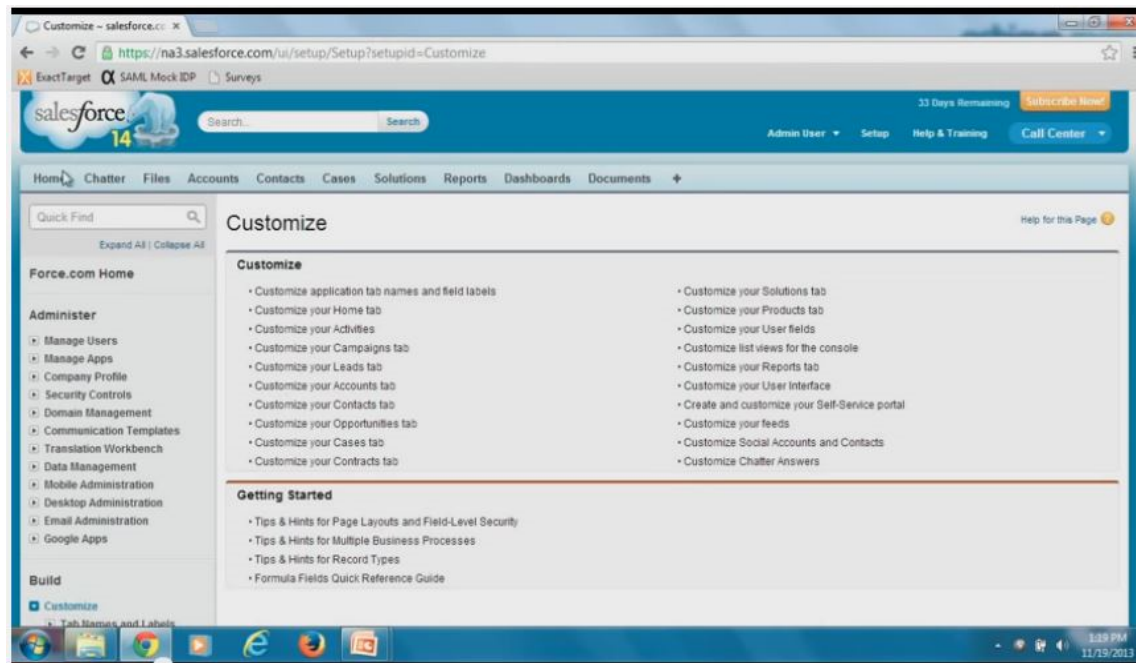
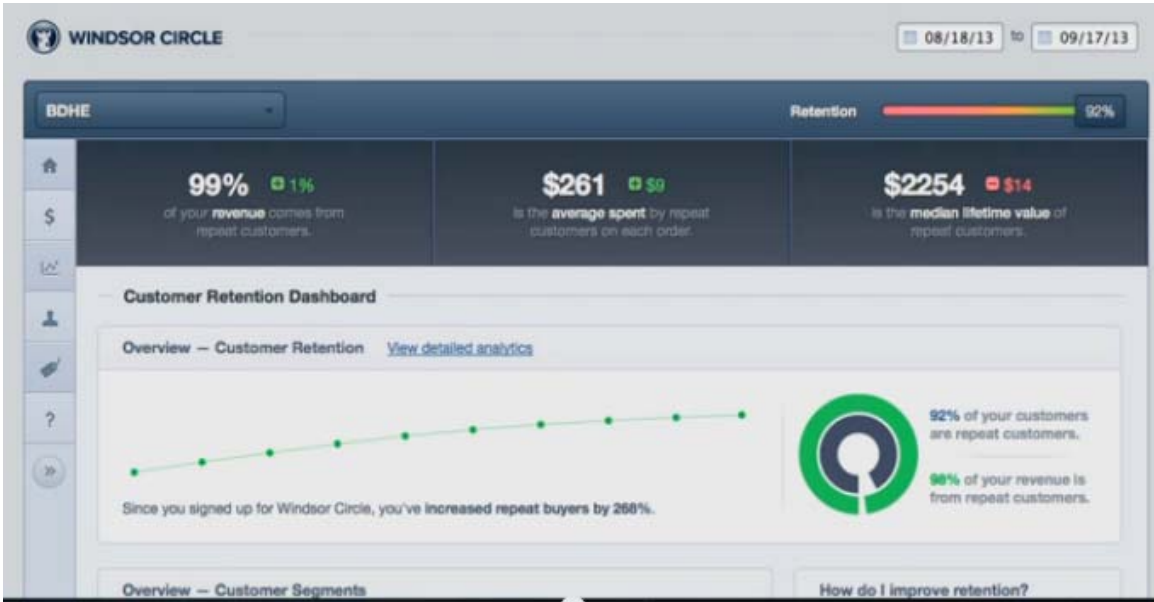


Figure 8. The "Customize" Area of the Service Cloud User Interface³⁷

An ExactTarget Marketing Cloud user can customize ExactTarget Marketing Cloud functionalities through the ExactTarget Fuel platform.³⁸ ExactTarget Marketing Cloud is an application container

³⁷ *Id.* at 17:08

³⁸ <http://www.exacttarget.com/products/platform/fuel-platform>

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	<p>that contains a number of Salesforce applications, including Email, Mobile, and Social applications.³⁹ The ExactTarget Fuel platform opens ExactTarget Marketing Cloud to third-party development to create third-party applications that fully integrate with ExactTarget Marketing Cloud functionalities, including common calendaring, campaign management, and analytics frameworks.⁴⁰</p>  <p>Figure 9A. A Third-Party Application Built for ExactTarget Marketing Cloud⁴¹</p>

³⁹ <http://www.exacttarget.com/products>

⁴⁰ Dreamforce Video: "Building Apps for the ExactTarget Marketing Cloud" (<http://www.youtube.com/watch?v=b6N7PDO73o>)

⁴¹ *Id.* at 21:48

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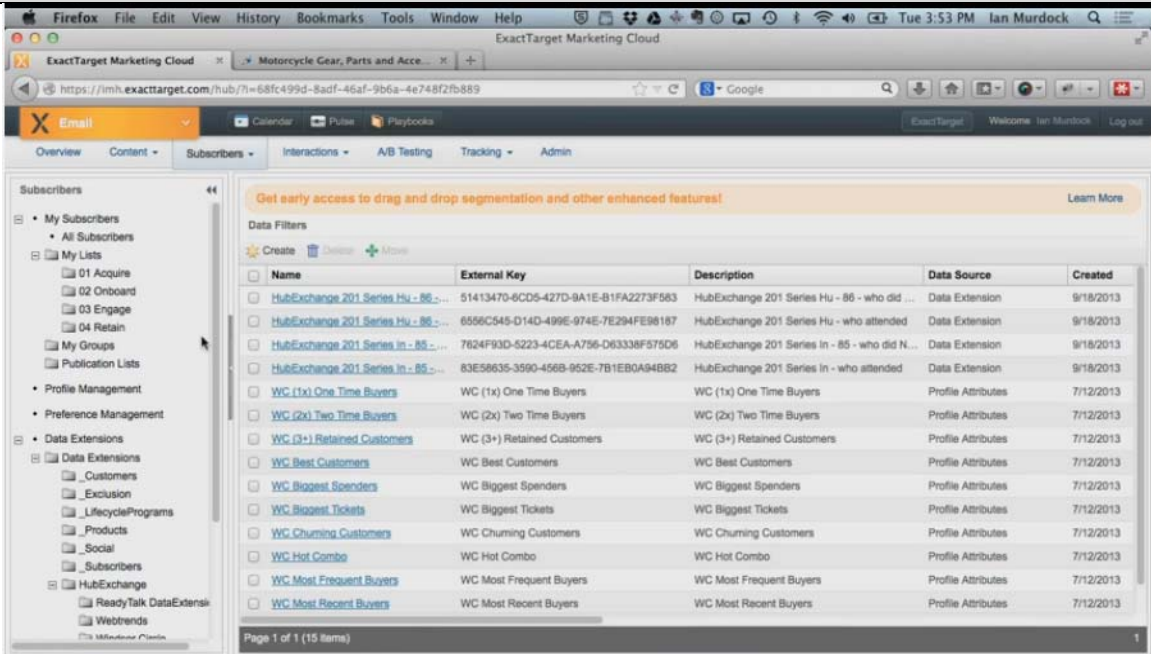


Figure 9B. A Third-Party Application Integrated With ExactTarget Marketing Cloud Applications⁴²

An application developed on the Force.com platform or Salesforce1 platform (e.g., Sales Cloud, Service Cloud, Marketing Cloud, and ExactTarget Marketing Cloud) implements a standard or customized user interface, which is an embodiment of one or more user interface elements.⁴³ The Force.com platform offers Visualforce for developing custom user interfaces.

⁴² *Id.* at 22:59

⁴³ http://wiki.developerforce.com/page/User_Interface

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	<p>The Site.com platform is part of the Salesforce1 platform. It is a cloud-based Web Content Management System (CMS) that enables its users to design and publish websites (i.e., web-based applications) having static and/or dynamic contents.⁴⁴ Using the "drag-and-drop studio" feature, a Site.com platform user can build web pages, templates, navigation, and style sheets.⁴⁵ With the "integrated hosting" feature, a Site.com platform user can test and publish web pages anywhere (e.g., locally or globally).⁴⁶</p> <p>The Database.com platform is a cloud-based database.⁴⁷ It is the backbone of the Salesforce1 platform, which manages data for applications running on the Salesforce1 platform.</p>
1-1. a server computer;	<p>A Salesforce server computer hosting the Force.com platform or the Salesforce1 platform is an embodiment of <u>a server computer</u>.</p> <p>The Force.com platform and the Salesforce1 platform are hosted by at least one server.</p> <p>The Salesforce1 platform uses the Force.com platform, with all application logic and database storage provided by Salesforce's hosted application servers.⁴⁸</p> <p>The Force.com platform is a cloud application development platform that powers many Salesforce cloud applications (e.g., Sales Cloud, Service Cloud, Marketing Cloud, ExactTarget Marketing Cloud, etc.) as well third-party applications built by Salesforce customers.⁴⁹ The Force.com platform is a</p>

⁴⁴ <http://wiki.developerforce.com/page/Websites>; <http://www.site.com/home>


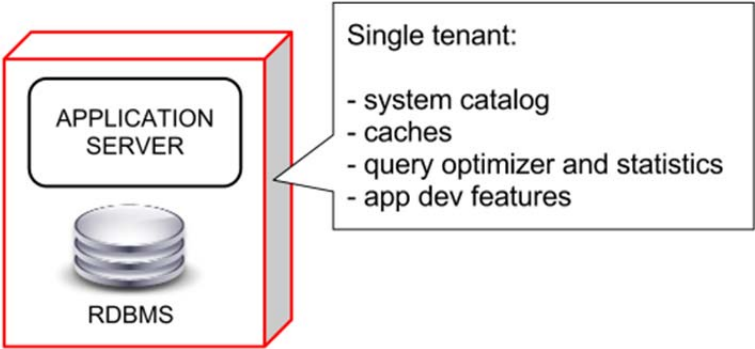
⁴⁵ <http://www.site.com/features>: "Design the next big thing - Drag-and-drop studio"; <http://www.site.com/home>: "What is Site.com?" video

⁴⁶ <http://wiki.developerforce.com/page/Websites>; <http://www.site.com/features>: "Publish, then plan your vacation - Integrated hosting"; <http://www.site.com/home>: "What is Site.com?" video

⁴⁷ <http://www.salesforce.com/platform/database/>

⁴⁸ http://help.salesforce.com/apex/HTViewSolution?id=000187601&language=en_US: "Salesforce1 Architecture Overview"

⁴⁹ https://wiki.developerforce.com/page/Multi_Tenant_Architecture: "Force.com Architecture Overview"

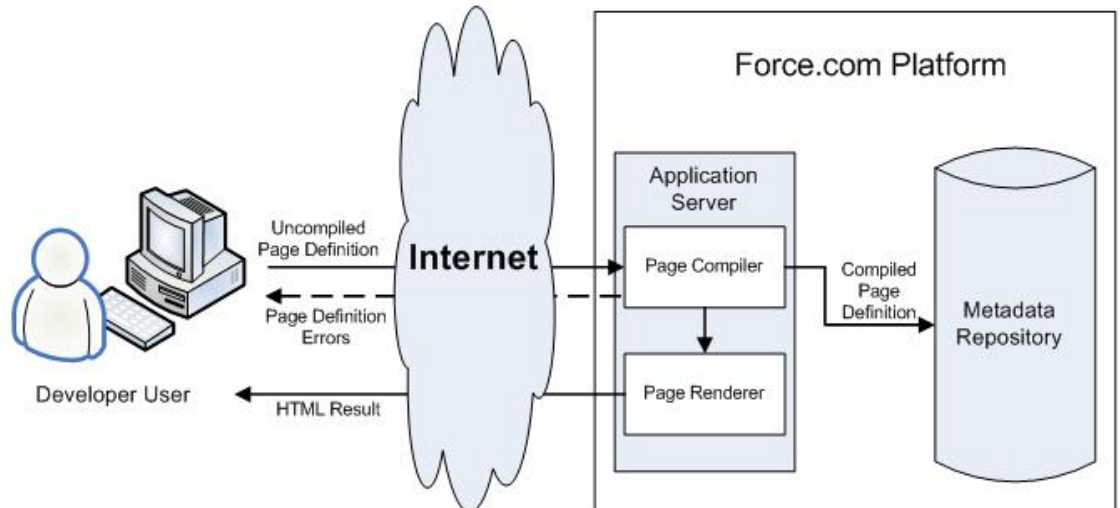
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	<p>Platform as a Service (PaaS) that is built for cloud computing, with multitenancy inherent to its design.⁵⁰ Developer users can build server-side application components using the Force.com Web browser-based development environment.⁵¹</p> <div> <div> <p>Multitenant:</p> <ul style="list-style-type: none"> - system catalog - caches - query optimizer and statistics - app dev features </div>  <div>  </div> </div> <p>Figure 10. The Force.com Platform Multitenant Architecture⁵²</p>

⁵⁰ *Id.*: "Force.com Architecture Overview - Multitenant Kernel "

⁵¹ *Id.*: "Multitenant App Development - The Force.com Browser-Based Development Environment"

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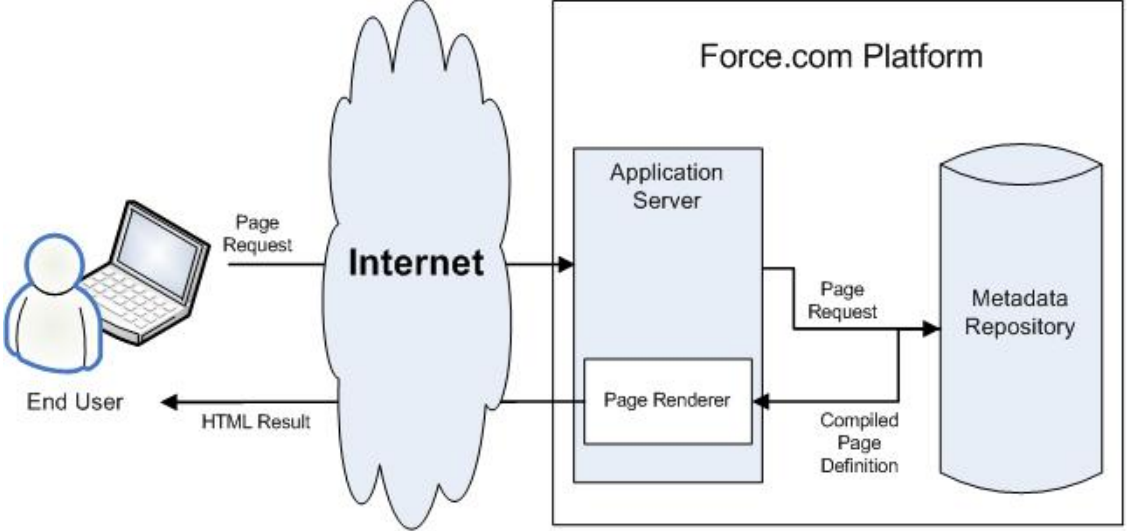
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	 <p>The diagram illustrates the Force.com Platform Architecture. A Developer User (represented by a person icon and a computer) interacts with the Internet (represented by a cloud). The Internet connects to the Force.com Platform, which consists of an Application Server. Inside the Application Server, there is a Page Compiler and a Page Renderer. The Page Compiler sends a Compiled Page Definition to a Metadata Repository (represented by a cylinder). The Page Renderer sends an HTML Result back to the Internet, which then reaches the Developer User. The Internet also sends Uncompiled Page Definition and Page Definition Errors back to the Developer User.</p> <p>Figure 11A. The Force.com Platform Architecture⁵³</p>

⁵² *Id.*: "Force.com Architecture Overview - Multitenant Kernel"⁵³ https://www.salesforce.com/us/developer/docs/pages/Content/pages_intro_architecture.htm

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	 <p data-bbox="909 987 1570 1024">Figure 11B. The Force.com Platform Architecture⁵⁴</p> <p data-bbox="583 1040 1885 1187">In 2008, Salesforce migrated to Dell servers with AMD processors running Linux.⁵⁵ In 2013, Salesforce and Oracle Corp. announced a 9-year partnership in which Salesforce will use Oracle Linux, Oracle Exadata, Oracle Database, and the Java platform to power Salesforce's applications and platforms.⁵⁶</p> <p data-bbox="583 1203 1837 1271">A Salesforce server computer hosting a Salesforce product, including Sales Cloud, Service Cloud, Marketing Cloud, and ExactTarget Marketing Cloud, in the product's web-based form, is an</p>

⁵⁴ *Id.*⁵⁵ http://www.theregister.co.uk/2008/07/14/salesforce_sun_server_dell/⁵⁶ <http://www.oracle.com/us/corporate/press/1964798>

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Asserted Claims and Limitations	Corresponding Elements in Accused Instrumentalities
	<p>embodiment of <u>a server computer</u>.</p> <p>A Salesforce product in the product's web-based form is a web-based application accessible from a web browser executing on a client computer. The product is hosted by at least one <u>server computer</u>.</p> <p>A server computer hosting a third-party application developed and deployed on the Force.com platform or the Salesforce1 platform that includes the web-based form is an embodiment of <u>a server computer</u>.</p> <p>A third-party application in the application's web-based form is a web-based application accessible from a web browser executing on a client computer. The application is hosted by at least one <u>server computer</u>.</p>
<p>1-2. one or more client computers connected to the server computer over a computer network;</p>	<p>A client computer connected to a Salesforce server computer hosting the Force.com platform or the Salesforce1 platform is an embodiment of <u>one or more client computers connected to the server computer over a computer network</u>. The internet is an embodiment of a <u>computer network</u>. The Salesforce1 platform uses the Force.com platform. The Force.com platform is a PaaS that is built for cloud computing. A developer user or end user accesses the Force.com platform through the user's client computer connected to an application server hosting the Force.com platform via the Internet.⁵⁷</p> <p>A Salesforce employee or third-party end user's client computer connected to a Salesforce server computer hosting a Salesforce product, including Sales Cloud, Service Cloud, Marketing Cloud, and ExactTarget Marketing Cloud, in the product's web-based form, is an embodiment of <u>one or more client computers connected to the server computer over a computer network</u>.</p> <p>A Salesforce product in the product's web-based form is a web-based application accessible from a web browser executing on a client computer.⁵⁸</p>

⁵⁷ See, Figures 10-11B

⁵⁸ See, Figures 1-4B

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Asserted Claims and Limitations	Corresponding Elements in Accused Instrumentalities
	<p>A Salesforce employee or third-party end user's client computer connected to a server computer hosting a third-party application developed and deployed on the Force.com platform or the Salesforce1 platform that includes the web-based form is an embodiment of <u>one or more client computers connected to the server computer over a computer network</u>.</p> <p>A third-party application in the application's web-based form is a web-based application accessible from a web browser executing on a client computer.⁵⁹</p>
1-3. a first layer associated with the server computer containing information about the unique aspects of a particular application;	<p>The app logic (e.g., business logic) of a Salesforce product⁶⁰ or a third-party application⁶¹ developed and deployed on the Force.com platform or the Salesforce1 platform is an embodiment of <u>a first layer associated with the server computer containing information about the unique aspects of a particular application</u>.</p> <p>The Salesforce1 platform uses the Force.com platform.⁶² The Force.com platform implements a Model-View-Controller (MVC) architecture through Visualforce based on the separation of data presentation from data manipulation. In such an architecture, the "model" represents the data model, the "view" represents the presentation of the data (user interface), and the "controller" represents the business logic that manipulates the data and controls the user interface.⁶³ The "view" (e.g., user interface) and the "controller" (e.g., business logic) thus belong to two different layers.⁶⁴</p> <p>The Force.com and Database.com platforms offer two approaches for implementing business logic for a third-party application developed on the Force.com platform or the Salesforce1 platform.⁶⁵ Standard</p>

⁵⁹ See, Figures 5B-5C

⁶⁰ See, Figures 1-4B

⁶¹ See, Figures 5B-5C

⁶² http://help.salesforce.com/apex/HTViewSolution?id=000187601&language=en_US: "Salesforce1 Architecture Overview"

⁶³ http://wiki.developerforce.com/page/Visualforce:_An_Overview: "Developing with Visualforce"

⁶⁴ Reference [1], page 8, "Force.com Stack Overview"

⁶⁵ http://wiki.developerforce.com/page/App_Logic; https://developer.salesforce.com/page/App_Logic

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Asserted Claims and Limitations	Corresponding Elements in Accused Instrumentalities
	<p>business logic may be implemented using point-and-click declarative features such as formulas, workflow rules, approval processes, and visual workflow.⁶⁶ Custom business logic may be implemented using Apex code.⁶⁷</p> <p>Salesforce products, including Sales Cloud, Service Cloud, Marketing Cloud, and ExactTarget Marketing Cloud, implement various functionalities embodying the app or business logic of the product. For example, Sales Cloud implements business logic relating to sales.⁶⁸ Service Cloud implements business logic relating to customer service.⁶⁹ Marketing Cloud and ExactTarget Marketing Cloud implement business logic relating to marketing.⁷⁰</p> <p>On information and belief, the static and/or dynamic content of a web-based application developed on the Site.com platform is an embodiment of <u>a first layer associated with the server computer containing information about the unique aspects of a particular application.</u></p> <p>Static and/or dynamic content of a web page can be implemented using the drag-and-drop studio feature of the Site.com platform.⁷¹</p>
1-4. a second layer associated with the server computer containing	The user interface of a Salesforce product ⁷² or a third-party application ⁷³ developed and deployed on the Force.com platform or the Salesforce1 platform is an embodiment of <u>a second layer associated with the server computer containing information about the user interface and functions common to a</u>

⁶⁶ http://wiki.developerforce.com/page/App_Logic: "Point-and-Click App Logic"

⁶⁷ http://wiki.developerforce.com/page/App_Logic: "Apex Code"

⁶⁸ Salesforce Video: "Sales Cloud Overview and Demo" (<http://www.youtube.com/watch?v=yz2ec1J6QQA>)

⁶⁹ Salesforce Video: "Service Cloud Overview and Demo" (<http://www.youtube.com/watch?v=hwKFv9X1yhU>)

⁷⁰ Salesforce Video: "Salesforce Marketing Cloud Demo" (<http://www.youtube.com/watch?v=6C7FYZvSKYc>); Salesforce Video: "ExactTarget Marketing Cloud Overview Demo" (<http://www.youtube.com/watch?v=x1wwxcoA82o>)

⁷¹ <http://www.site.com/features>: "Design the next big thing - Drag-and-drop studio"; <http://www.site.com/home>: "What is Site.com?" video

⁷² See, Figures 1-4B

⁷³ See, Figures 5B-5C

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Asserted Claims and Limitations	Corresponding Elements in Accused Instrumentalities
information about the user interface and functions common to a variety of applications,	<p><u>variety of applications.</u></p> <p>The Force.com platform implements a Model-View-Controller (MVC) architecture based on the separation of data presentation from data manipulation. In such an architecture, the “model” represents the data model, the “view” represents the presentation of the data (user interface), and the “controller” represents the business logic that manipulates the data and controls the user interface. The “view” (e.g., user interface) and the “controller” (e.g., business logic) thus belong to two different layers.⁷⁴</p> <p>A Salesforce product, including Sales Cloud, Service Cloud, Marketing Cloud, and ExactTarget Marketing Cloud, implements a web-based user interface for accessing the product.⁷⁵ The web-based user interface can be accessed through a web browser on a user client computer.</p> <p>A third-party application can implement a web-based user interface for accessing the application.⁷⁶ The Force.com platform offers a standard user interface with one or more page layouts that correspond to an application's objects. The standard user interface includes an embodiment of <u>functions common to a variety of applications.</u>⁷⁷</p> <p>Customized user interfaces may be implemented using Visualforce.⁷⁸ User interfaces may be constructed using native Visualforce markup and standard Web development technologies such as HTML5, CSS, JavaScript, and jQuery.</p>

⁷⁴ Reference [1], page 8, “Force.com Stack Overview”

⁷⁵ See, Figures 1-4B

⁷⁶ See, Figures 5B-5C

⁷⁷ http://wiki.developerforce.com/page/User_Interface

⁷⁸ http://wiki.developerforce.com/page/Visualforce:_An_Overview; Salesforce Video: “Introduction to Visualforce” (<http://www.youtube.com/watch?v=wo74xdvtvUE>); Salesforce Video: “Advanced Visualforce Webinar” (<http://www.youtube.com/watch?v=IbS6rmPZkbM>)

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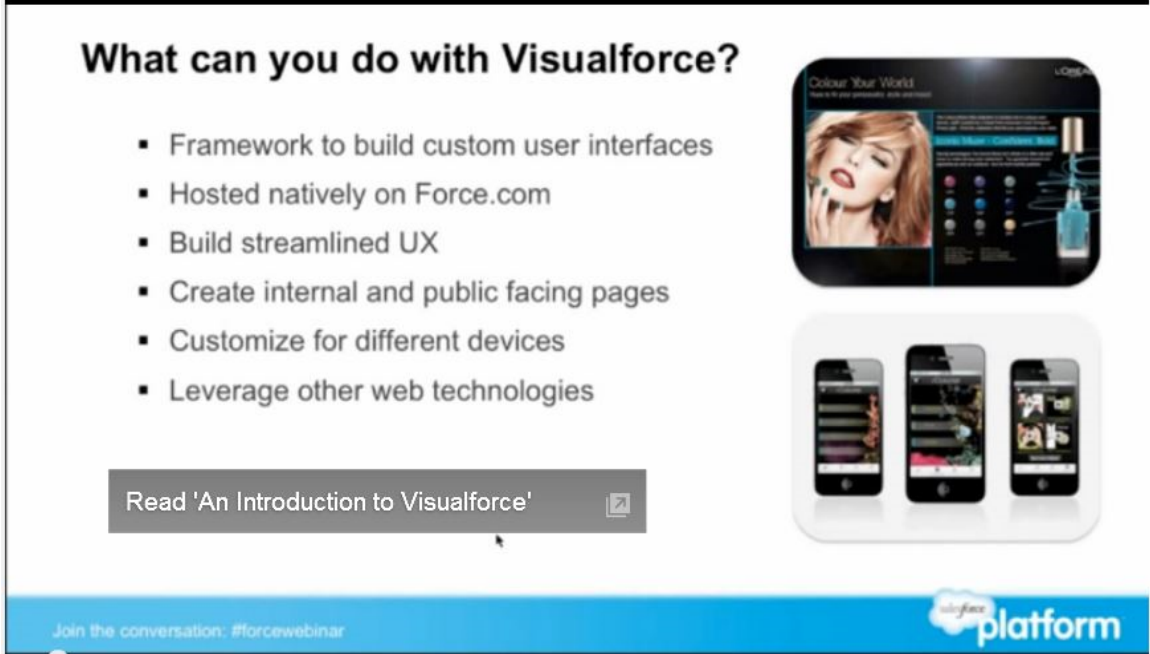

Asserted Claims and Limitations	Corresponding Elements in Accused Instrumentalities
	 <p>The screenshot displays a Visualforce advertisement titled "What can you do with Visualforce?". It lists several functionalities: <ul style="list-style-type: none"> ▪ Framework to build custom user interfaces ▪ Hosted natively on Force.com ▪ Build streamlined UX ▪ Create internal and public facing pages ▪ Customize for different devices ▪ Leverage other web technologies To the right of the list are two images: the top one shows a custom interface for "Colour Your World" with a woman's face and product recommendations; the bottom one shows three mobile phones displaying different custom mobile apps. Below the list is a button that says "Read 'An Introduction to Visualforce'" with a small icon. At the bottom of the slide, it says "Join the conversation: #forcewebinar" and features the "salesforce platform" logo. </p>

Figure 12. Visualforce Functionalities⁷⁹

⁷⁹ Salesforce Video: "Introduction to Visualforce" (<http://www.youtube.com/watch?v=wo74xdvtvUE>) 2:06-2:38

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Asserted Claims and Limitations	Corresponding Elements in Accused Instrumentalities
	 <p data-bbox="806 1247 1671 1284">Figure 13. Example User Interface Constructed Using Visualforce⁸⁰</p>

⁸⁰ http://wiki.developerforce.com/page/User_Interface

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	<p>On information and belief, a web page of a web-based application developed on the Site.com platform is an embodiment of <u>a second layer associated with the server computer containing information about the user interface and functions common to a variety of applications.</u></p> <p>The user-interface components of a web page can be implemented using the drag-and-drop studio feature of the Site.com platform.⁸¹</p>
<p>1-5. a particular application being generated based on the data in both the first and second layers;</p>	<p>A Salesforce product or a third-party application developed and deployed on the Force.com platform or the Salesforce1 platform is generated based on its user interface and app logic or business logic, which is an embodiment of <u>a particular application being generated based on the data in both the first and second layers.</u></p> <p>Salesforce products, including Sales Cloud, Service Cloud, Marketing Cloud, and ExactTarget Marketing Cloud, implement a web-based user interface for accessing the product,⁸² as well as functionalities that embody the app logic or business logic of the products and are embodiments of <u>a particular application being generated based on the data in both the first and second layers.</u></p> <p>A third-party application developed and deployed on the Force.com platform or the Salesforce1 platform can implement a web-based user interface for accessing the application,⁸³ as well as functionalities that embody the app logic or business logic of the applications and are embodiments of <u>a particular application being generated based on the data in both the first and second layers.</u></p> <p>On information and belief, a web-based application developed on the Site.com platform is dynamically generated based on its user interface (e.g., web pages) and static and/or dynamic content, which is an embodiment of <u>a particular application being generated based on the data in both the first and second layers.</u></p>

⁸¹ <http://www.site.com/features>: "Design the next big thing - Drag-and-drop studio"; <http://www.site.com/home>: "What is Site.com?" video

⁸² See, Figures 1-4B

⁸³ See, Figures 5B-5C

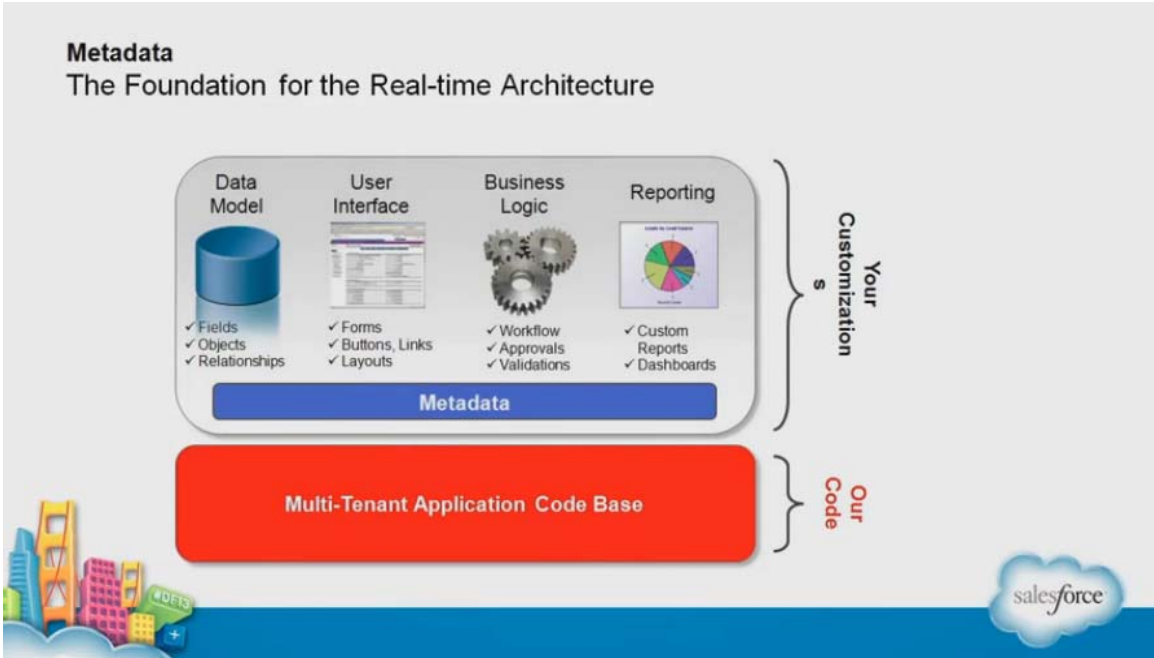
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<p>1-6. a third layer associated with the server computer that retrieves the data in the first and second layers in order to generate the functionality and user interface elements of the application; and</p>	<p>The Force.com runtime engine (kernel) and runtime application generator are an embodiment of <u>a third layer associated with the server computer that retrieves the data in the first and second layers in order to generate the functionality and user interface elements of the application.</u></p> <p>With the Force.com platform, everything exposed to application developers and users is internally represented and stored as metadata (e.g., metadata corresponding to each tenant's customizations and metadata describing the base functionality of an application). At runtime, the Force.com platform's runtime engine uses the metadata to generate the "virtual" application components and the Force.com platform's runtime application generator uses the metadata to render the application components in the interface.⁸⁴</p> <p>Metadata lies at the heart of the Force.com platform. The Force.com IDE, Force.com Migration Tool, and the browser-based user interface are all powered by metadata. The Force.com platform uses metadata to provide on-demand applications directly in the cloud. On the Force.com platform, metadata defines components including all aspects of Force.com functionality, from the appearance of user interfaces through workflow. Examples of components of metadata include custom user interface created using Visualforce, generated page layouts, and Apex classes for custom application functionality. Just about every aspect of a Force.com application, ranging from workflows to the configuration of database object, is metadata.⁸⁵</p> <p>The Force.com platform provides a metadata model and Metadata API. Platform metadata describes the applications developed on the Force.com platform, and the Metadata API encompasses a set of</p>

⁸⁴ Reference [1], page 7, paragraphs 2-3

⁸⁵ [http://wiki.developerforce.com/page/An_Introduction_to_Force.com_Metadata: "Metadata and Metadata API - Defining Metadata"](http://wiki.developerforce.com/page/An_Introduction_to_Force.com_Metadata:_\)

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	<p>methods that provide programmatic access to the configuration and source of the applications developed on the Force.com platform,⁸⁶ including the Force.com IDE⁸⁷ and Force.com Migration Tool⁸⁸.</p>  <p>Figure 14A. Metadata-Driven Architecture⁸⁹</p>

⁸⁶ [http://wiki.developerforce.com/page/An_Introduction_to_Force.com_Metadata: "Abstract"](http://wiki.developerforce.com/page/An_Introduction_to_Force.com_Metadata:_\)

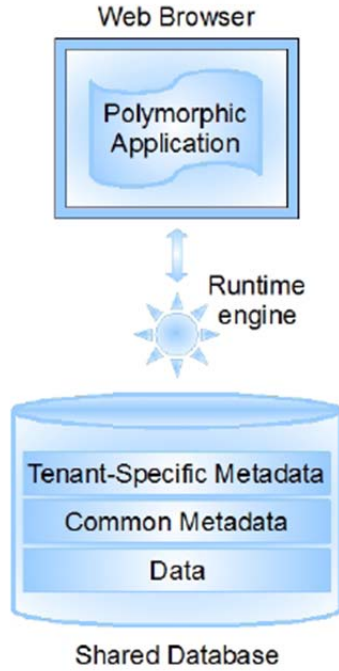
⁸⁷ http://wiki.developerforce.com/page/Force.com_IDE

⁸⁸ http://wiki.developerforce.com/page/Migration_Tool_Guide

⁸⁹ Dreamforce Video: "How Salesforce.com R&D Delivers the Cloud" (<http://www.youtube.com/watch?v=oc--Ki9bykU>) at 1:59

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	<p>The Salesforce1 and Force.com platform describe the base functionality and user customizations as metadata, including base functionality and user-defined customization of the Salesforce Sales Cloud, Service Cloud, Marketing Cloud, and ExactTarget Marketing Cloud.⁹⁰</p> <p>On information and belief, the metadata defines both unique and common aspects and functions of both third-party and Salesforce applications, such as Sales Cloud, Service Cloud, Marketing Cloud, and ExactTarget Marketing Cloud.</p>

⁹⁰ http://wiki.developerforce.com/page/An_Introduction_to_Force.com_Metadata: "Metadata and Metadata API - How Metadata Defines Your Applications"; Force.com: A Comprehensive Look at the World's Premier Cloud-Computing Platform at 7.

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	 <p style="text-align: center;">Figure 14B: Metadata Driven Architecture⁹¹</p> <p>The metadata driven architecture of the Salesforce1 and Force.com platform allows modifications or customizations to applications through non-blocking updates to the corresponding metadata. When a</p>

⁹¹ Force.com: A Comprehensive Look at the World’s Premier Cloud-Computing Platform at 7.

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Asserted Claims and Limitations	Corresponding Elements in Accused Instrumentalities
	user works with the application, Force.com's runtime application generator uses metadata to render the application components in the interface. ⁹²
1-7. a change management layer for automatically detecting changes that affect an application,	<p>The Salesforce1 platform automatically detects and incorporates changes to a Salesforce product, including Sales Cloud, Service Cloud, Marketing Cloud, and ExactTarget Marketing Cloud is an embodiment of <u>a change management layer for automatically detecting changes that affect an application</u>.</p> <p>An administrator user can make real-time customizations to Sales Cloud, Service Cloud, Marketing Cloud, and ExactTarget Marketing Cloud through the product's user interface.⁹³ The changes are incorporated into the product in real time and are detected automatically by the change management layer of the Salesforce1 platform.</p> <p>The Force.com change management (e.g., a developer sandbox) is an embodiment of <u>a change management layer for automatically detecting changes that affect an application</u>.⁹⁴</p> <p>A developer sandbox is a single development environment used to isolate development and testing.⁹⁵ A developer sandbox tracks changes made to a specific production by performing a sandbox refresh.⁹⁶ The Force.com platform provides an environment for applications and data during development, called an "organization" or "org." A developer sandbox is a "sandbox org."⁹⁷</p> <p>A change process established for a production may be used to track changes.⁹⁸</p>

⁹² *Id.*⁹³ *See*, Figures 7A-8⁹⁴ Reference [1], page 11, paragraph 1⁹⁵ Reference [2], pages 2-6, 11, 22-23⁹⁶ Reference [2], page 21, paragraph 4⁹⁷ http://wiki.developerforce.com/page/An_Introduction_to_Force.com_Metadata:_Organizations_and_Moving_Metadata⁹⁸ Reference [2], pages 21-22

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Asserted Claims and Limitations	Corresponding Elements in Accused Instrumentalities
	<p>The Force.com Migration Tool tracks changes using scripts.⁹⁹ The Force.com integrated development environment (IDE) can also track and synchronize changes.¹⁰⁰</p> <p>Real-time changes to a third-party application developed and deployed on the Force.com and/or Salesforce1 platform are detected by <u>a change management layer for automatically detecting changes that affect an application.</u></p> <p>An administrator user is able to make real-time changes (e.g., contextual actions) to a third-party application developed and deployed on the Salesforce1 platform using the "publisher" tool. An administrator user can add a custom action to the "publisher" area of a third-party application, save the change, and refresh the application. The Salesforce1 platform then automatically incorporates the changes in both the desktop version and the mobile version of the application in real time.¹⁰¹</p>

⁹⁹ Reference [2], pages 22-23

¹⁰⁰ Reference [2], pages 18-19

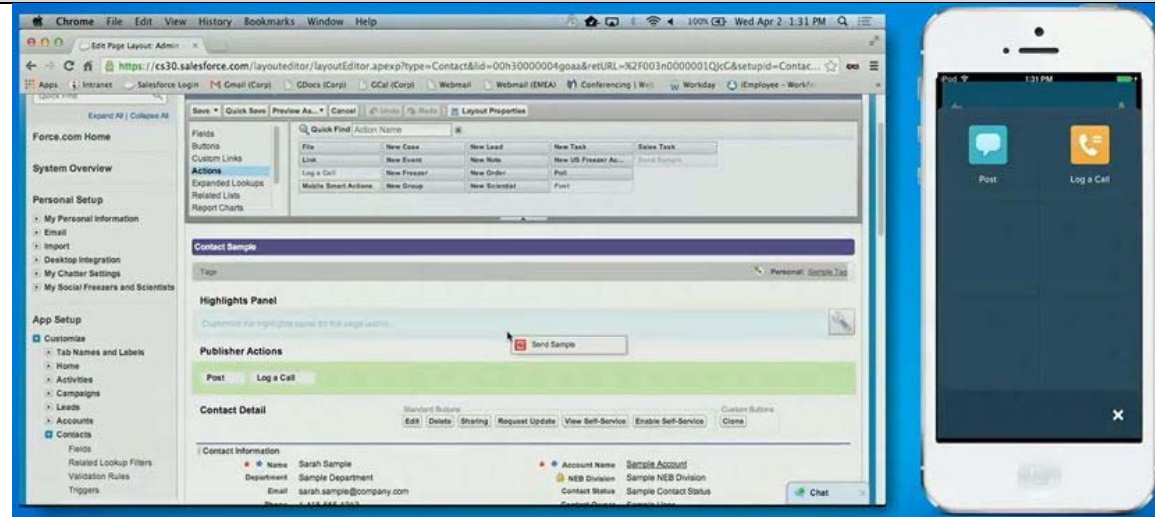
¹⁰¹ Salesforce Video: "Salesforce1 Platform: Building Next Generation Apps, IT and Devices - Salesforce1 World Tour Boston" (<http://www.youtube.com/watch?v=AJJOHXZi3Mg>) at 24:02-26:37

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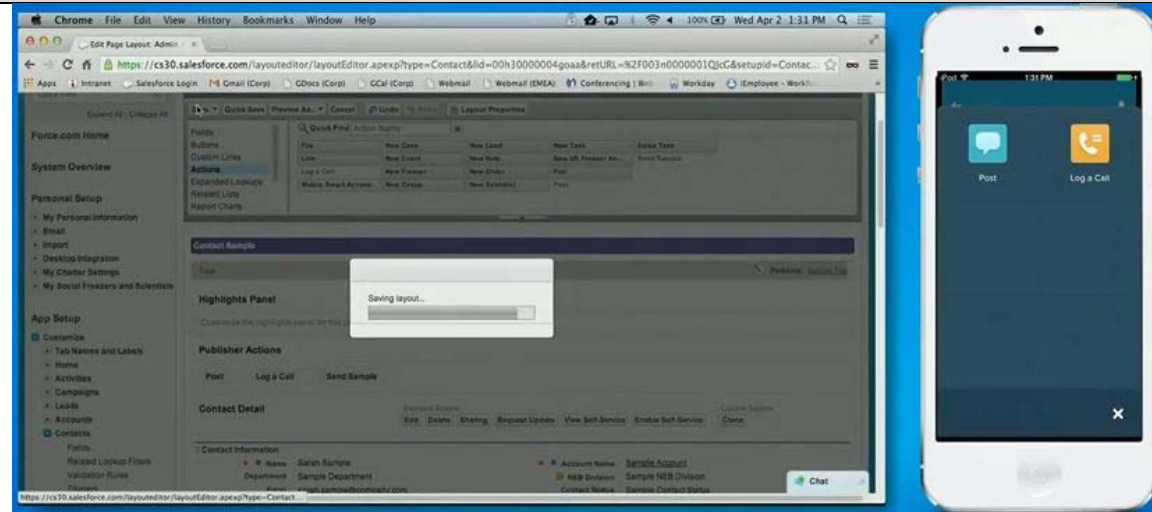
Corresponding Elements in Accused Instrumentalities

Figure 15A. Adding a Custom Action to the "Publisher" Area of a Third-Party Application¹⁰²¹⁰² *Id.* at 25:15.

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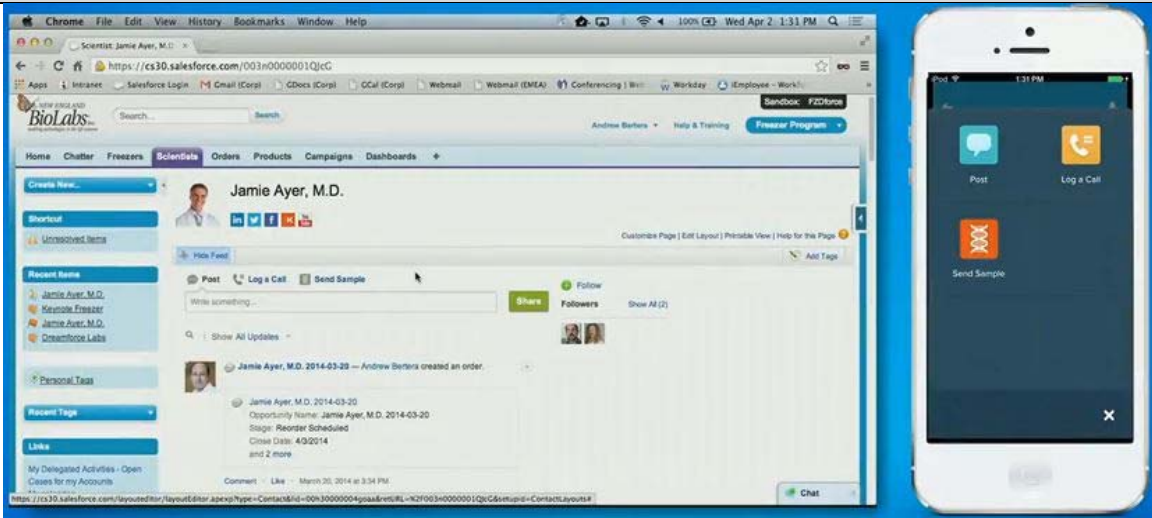
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Figure 15B. Saving a Custom Action Added to the "Publisher" Area of a Third-Party Application¹⁰³¹⁰³ *Id.* at 25:19

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Asserted Claims and Limitations	Corresponding Elements in Accused Instrumentalities
	 <p>Figure 15C. Refreshing a Third-Party Application to Incorporate a Custom Action¹⁰⁴</p>
<p>1-8. each client computer further comprising a browser application being executed by each client computer,</p>	<p>A Force.com platform or Salesforce1 platform user's client computer is an embodiment of <u>each client computer</u>. A web browser executing on a Force.com platform or Salesforce1 platform user's client computer is an embodiment of <u>a browser application being executed by each client computer</u>.</p> <p>A Salesforce product, including Sales Cloud, Service, Cloud, Marketing Cloud, and ExactTarget Marketing Cloud, in the product's web-based form is a web-based application accessible from a web browser executing on a client computer.¹⁰⁵</p> <p>A third-party web-based application developed and deployed on the Force.com platform or the</p>

¹⁰⁴ *Id.* at 25:53

¹⁰⁵ *See*, Figures 1-4B

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Asserted Claims and Limitations	Corresponding Elements in Accused Instrumentalities
	Salesforce1 platform is accessible from a web browser executing on a client computer. ¹⁰⁶
1-9. wherein a user interface and functionality for the particular application is distributed to the browser application and dynamically generated when the client computer connects to the server computer.	<p>Salesforce products, including Sales Cloud, Service Cloud, Marketing Cloud, and ExactTarget Marketing Cloud, have a web-based form where the product is accessed through a web-based user interface.¹⁰⁷ The product can be accessed from a web browser on a user client computer connected to a Salesforce server,¹⁰⁸ and the user interface and the functionalities of the product are distributed to the web browser and dynamically generated (e.g., dynamic web pages). Such products are embodiments of <u>a user interface and functionality for the particular application is distributed to the browser application and dynamically generated when the client computer connects to the server computer.</u></p> <p>When a Force.com platform or Salesforce1 platform user accesses a third-party web-based application through a web browser executing on user's client, the user interface and the functionalities (e.g., app logic or web page content) of the web-based application are distributed to the web browser and dynamically generated (e.g., dynamic web pages). Such applications are embodiments of <u>a user interface and functionality for the particular application is distributed to the browser application and dynamically generated when the client computer connects to the server computer.</u></p> <p>The metadata driven architecture of the Salesforce1 and Force.com platform allows modifications or customizations to applications through non-blocking updates to the corresponding metadata. When a user works with the application, Force.com's runtime application generator uses metadata to render the application components in the interface.¹⁰⁹</p>

¹⁰⁶ See, Figures 5B-5C

¹⁰⁷ See, Figures 1-4B

¹⁰⁸ See, Figures 10-11B

¹⁰⁹ Force.com: A Comprehensive Look at the World's Premier Cloud-Computing Platform at 7.

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	Third-party web-based applications may be developed on the Force.com platform or the Salesforce1 platform. ¹¹⁰ A web-based application may be published and delivered to its users through the Site.com platform. ¹¹¹ A public web application may be published on a public website using Force.com Sites. ¹¹²
3. The system of claim 1,	Salesforce directly and indirectly infringes Claim 3 of the '482 patent. See discussion in connection with Claim 1.
3-1. wherein the second layer comprises a business content database having data about one or more different predetermined business applications.	<p>The Force.com Database is an embodiment of a <u>business content database having data about one or more different predetermined business applications</u>.</p> <p>The Force.com Database is a cloud-based database that is the backbone of the Salesforce1 platform, currently supporting more than four million applications.¹¹³ Features of the database include application data persistence, drag-and-drop tools, automatic user interface generation, pre-built components, and pre-designed templates.¹¹⁴</p> <p>The Force.com Setup menu is a declarative web interface for creating database objects and configuring other aspects of the platform.¹¹⁵ The declarative web interface, called the Force.com</p>

¹¹⁰ <http://wiki.developerforce.com/page/Websites>

¹¹¹ <http://wiki.developerforce.com/page/Site.com>

¹¹² <http://wiki.developerforce.com/page/Sites>

¹¹³ <http://wiki.developerforce.com/page/Database>; <http://www.salesforce.com/platform/database>

¹¹⁴ <http://www.salesforce.com/platform/services>: "Cloud Database"; http://wiki.developerforce.com/page/An_Introduction_to_Force_Database

¹¹⁵ http://wiki.developerforce.com/page/An_Introduction_to_Force_Database: "Using Data Services with Force.com Builder"

INITIAL DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS PURSUANT TO LOCAL RULE 16.1-6 U.S. PATENT NO. 7,356,482 - <i>APPLICATIONS IN INTERNET TIME, LLC v. SALESFORCE.COM, INC.</i>	
Asserted Claims and Limitations	Corresponding Elements in Accused Instrumentalities
	builder, allows user to create objects and fields generating the native application user interface around them. ¹¹⁶ The interface creates metadata, which is used to generate a default user interface for each user-created database object. ¹¹⁷
4. The system of claim 3,	Salesforce directly and indirectly infringes Claim 4 of the '482 patent. See discussion in connection with Claims 1 and 3.
4-1. wherein the data further comprises one or more of business knowledge, logical designs, physical designs, physical structures and relationships associated with the predetermined business application.	Relationships exist among the database objects stored in the Force.com Database. ¹¹⁸ Additional features of the database include formulas, validation, triggers, labels, notes and attachments, track field history, etc. ¹¹⁹ The Force.com database builds on the foundation of the Force.com infrastructure to provide much of the platform's development power. Here you can create metadata that describes an application's custom database objects such as tables and fields. ¹²⁰

¹¹⁶ Abhinav Gupta & Ankit Arora, *Force.com Tips and Tricks* (2013), chapters 1 & 3

¹¹⁷ http://wiki.developerforce.com/page/An_Introduction_to_Force_Database: "Using Data Services with Force.com Builder"

¹¹⁸ http://wiki.developerforce.com/page/An_Introduction_to_Force_Database: "Database Services Fundamentals"; *see also*, <http://www.salesforce.com/platform/database>

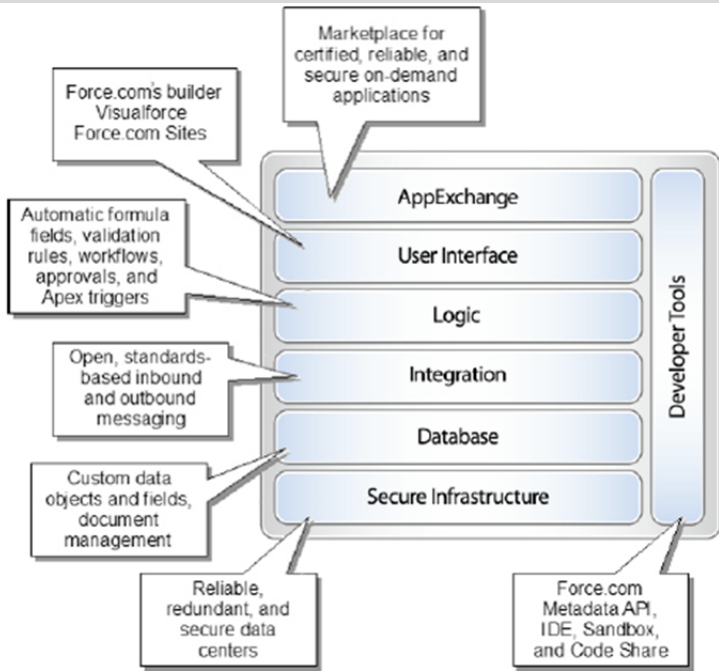
¹¹⁹ http://wiki.developerforce.com/page/An_Introduction_to_Force_Database: "Other Database Services";

http://wiki.developerforce.com/page/Build_Your_Cloud_Database

¹²⁰ Force.com: A Comprehensive Look at the World's Premier Cloud-Computing Platform at 8-10.

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Asserted Claims and Limitations	Corresponding Elements in Accused Instrumentalities
	 <p>Figure 16: Force.com Stack Overview¹²¹</p>
5. The system of claim 3,	Salesforce directly and indirectly infringes Claim 5 of the '482 patent. See discussion in connection with Claims 1 and 3.
5-1. wherein the second	The Force.com Database is an embodiment of <u>a metadata database comprising data about the</u>

¹²¹ *Id.* at 8.

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Asserted Claims and Limitations	Corresponding Elements in Accused Instrumentalities
layer comprises a metadata database comprising data about the structures and functions associated with any application.	<u>structures and functions associated with any application.</u> The Force.com platform and Salesforce1 platform provide a metadata model and metadata API. Platform metadata describes applications developed on the Force.com platform and the API encompasses a set of methods that provide programmatic access to the configuration and source of the applications. ¹²²
6. The system of claim 5,	Salesforce directly and indirectly infringes Claim 6 of the '482 patent. See discussion in connection with Claims 1, 3, and 5.
6-1. wherein the metadata database further comprises data about the user interface and functionality including one or more of tools, worklists, data entry forms, reports, documents, processes, formulas and images.	On the Force.com platform and Salesforce1 platform, metadata defines a rich set of components including all aspects of Force.com functionality, from the appearance of user interfaces through workflow. Examples of components of metadata include custom user interfaces created using Visualforce, generated page layouts, and Apex classes for custom application functionality. Just about every aspect of an application developed on the Force.com platform, ranging from workflows to the configuration of database objects that store data, is metadata. ¹²³
10. The system of claim 1,	Salesforce directly and indirectly infringes Claim 10 of the '482 patent. See discussion in connection

¹²² http://wiki.developerforce.com/page/An_Introduction_to_Force.com_Metadata

¹²³ http://wiki.developerforce.com/page/An_Introduction_to_Force.com_Metadata: "Metadata and the Metadata API"; *see also*, Figure 13

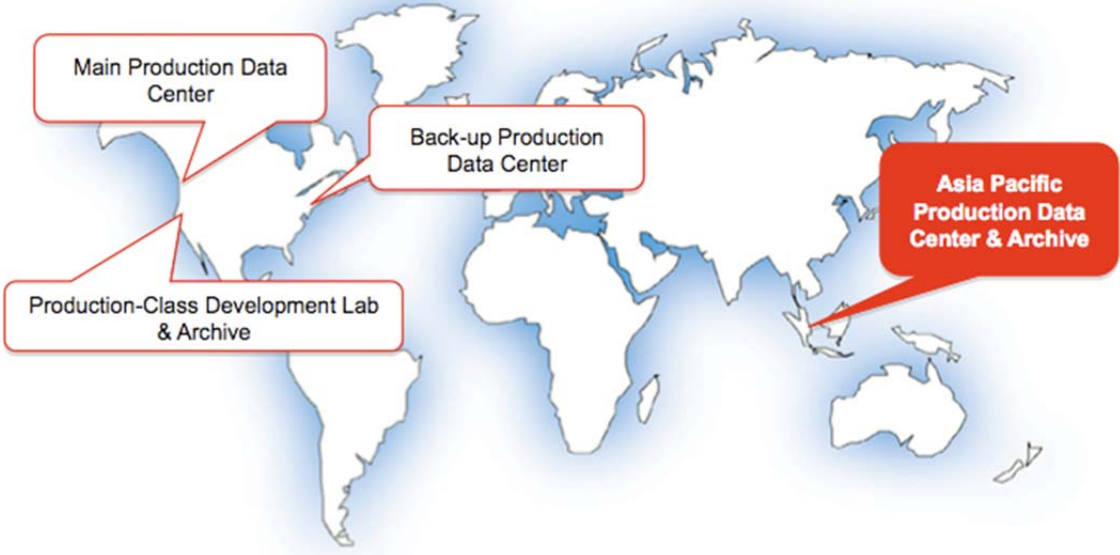
INITIAL DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS PURSUANT TO LOCAL RULE 16.1-6 U.S. PATENT NO. 7,356,482 - <i>APPLICATIONS IN INTERNET TIME, LLC v. SALESFORCE.COM, INC.</i>	
Asserted Claims and Limitations	Corresponding Elements in Accused Instrumentalities
	with Claim 1.
10-1. wherein the server further comprises a builder module for permitting a user to build a user interface for a particular application using the second layer.	<p>Visualforce of the Force.com platform and Salesforce1 platform is an embodiment of <u>a builder module for permitting a user to build a user interface for a particular application using the second layer</u>.</p> <p>Custom user interfaces for applications development on the Force.com platform and Salesforce1 platform may be constructed using Visualforce.¹²⁴</p> <p>On information and belief, the drag-and-drop studio of the Site.com platform an embodiment of <u>a builder module for permitting a user to build a user interface for a particular application using the second layer</u>. Web pages can be constructed using the drag-and-drop studio.¹²⁵</p>
20. The system of claim 1,	Salesforce directly and indirectly infringes Claim 20 of the '482 patent. See discussion in connection with Claim 1.
20-1. wherein the first and second layers are distributed across one or more server computers.	<p>Data and metadata associated applications developed on the Force.com platform and Salesforce1 platform, including app logic and user interfaces, are stored in the Force.com Database, which is hosted on one or more servers associated with the Force.com platform.</p> <p>Salesforce has several data centers around the world for hosting the Salesforce cloud,¹²⁶ which includes the Force.com platform, the Salesforce1 platform, Sales Cloud, Service Cloud, Marketing Cloud, and ExactTarget Marketing Cloud.</p>

¹²⁴ http://wiki.developerforce.com/page/User_Interface; http://wiki.developerforce.com/page/Visualforce:_An_Overview

¹²⁵ <http://www.site.com/features>: "Design the next big thing - Drag-and-drop studio"

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Asserted Claims and Limitations	Corresponding Elements in Accused Instrumentalities
	 <p>Figure 17. Salesforce Data Center Locations¹²⁷</p>

¹²⁶ http://www.salesforce.com/ap/company/sustainability/data_center_operations.jsp; <http://www.salesforce.com/ap/company/sustainability/operations.jsp>: "Data center operations"; http://www.salesforce.com/us/developer/docs/api/Content/sforce_api_om_outboundmessaging_security.htm; *see also*, Figure 10

¹²⁷ <https://success.salesforce.com/ideaView?id=087300000006ntCAAQ>

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Asserted Claims and Limitations	Corresponding Elements in Accused Instrumentalities
	 <p data-bbox="856 1089 1625 1133">Figure 18. Salesforce Fully Mirrored Cloud Infrastructure¹²⁸</p> <p data-bbox="583 1143 1848 1219">Each data center has multiple pods, and each Salesforce organization is serviced by a pod.¹²⁹ Each data center includes a number of application and storage servers.¹³⁰</p>

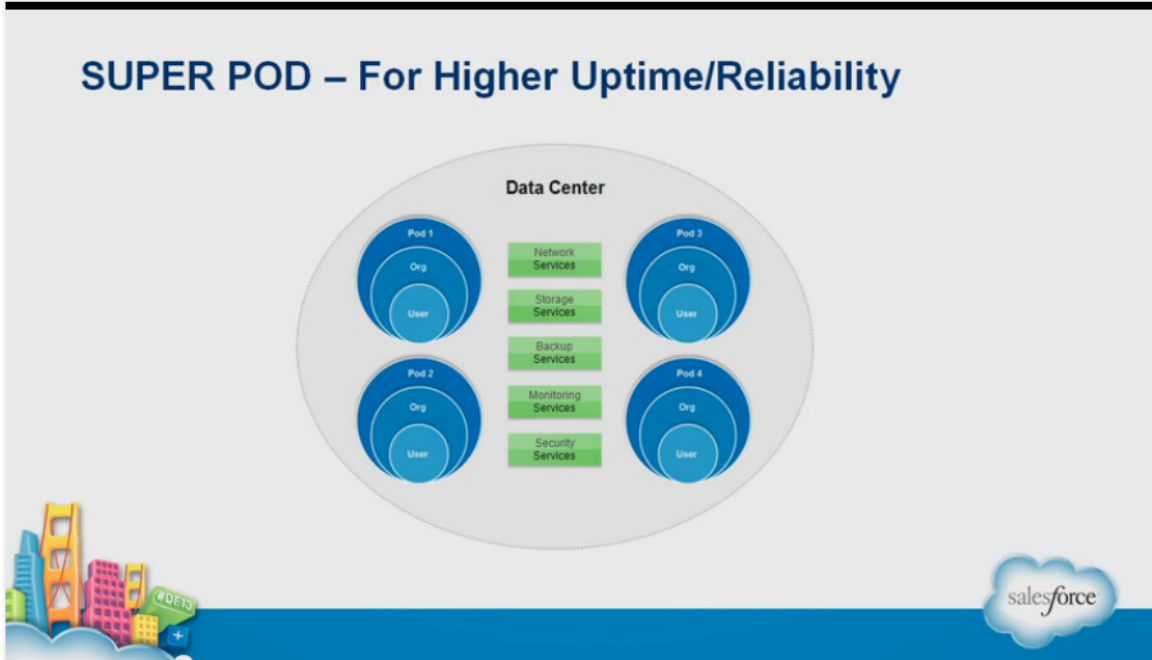
¹²⁸ Dreamforce Video: "Salesforce Platform: Cloud Confidence - A Virtual Tour of Salesforce Data Centers" (<http://www.youtube.com/watch?v=HhGkGJz5iKQ>) at 6:05

¹²⁹ *Id.* at 8:16-9:33

¹³⁰ *See*, Figures 19A-19B

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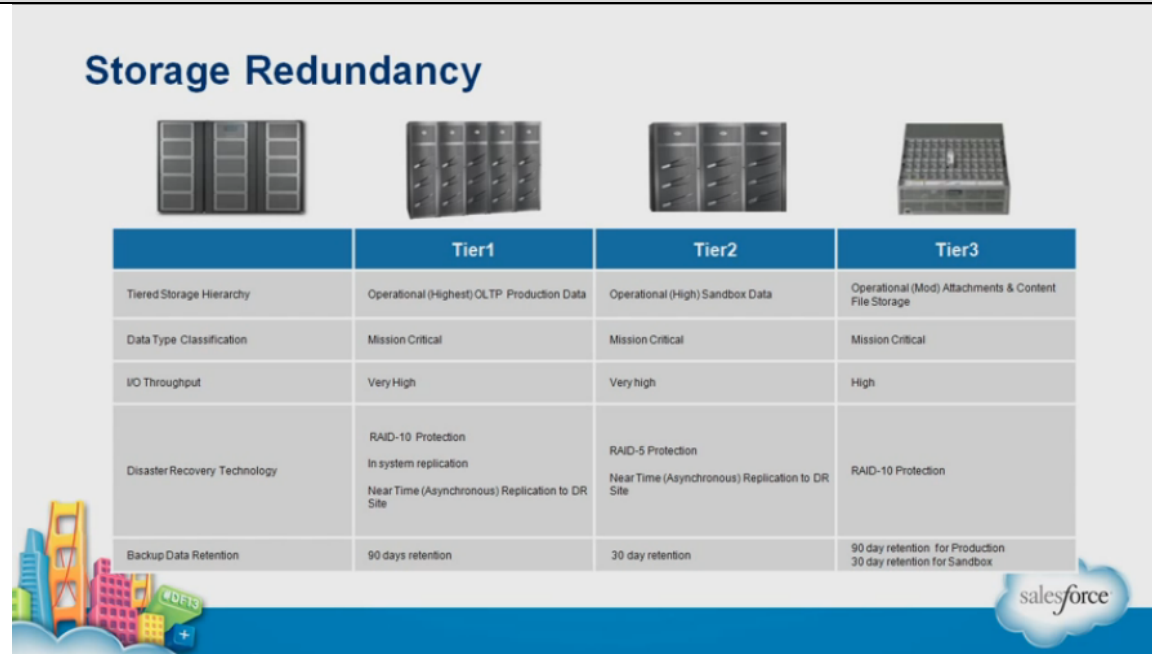
Asserted Claims and Limitations	Corresponding Elements in Accused Instrumentalities
	 <p data-bbox="934 1092 1543 1133">Figure 19. PODs of a Salesforce Data Center¹³¹</p>

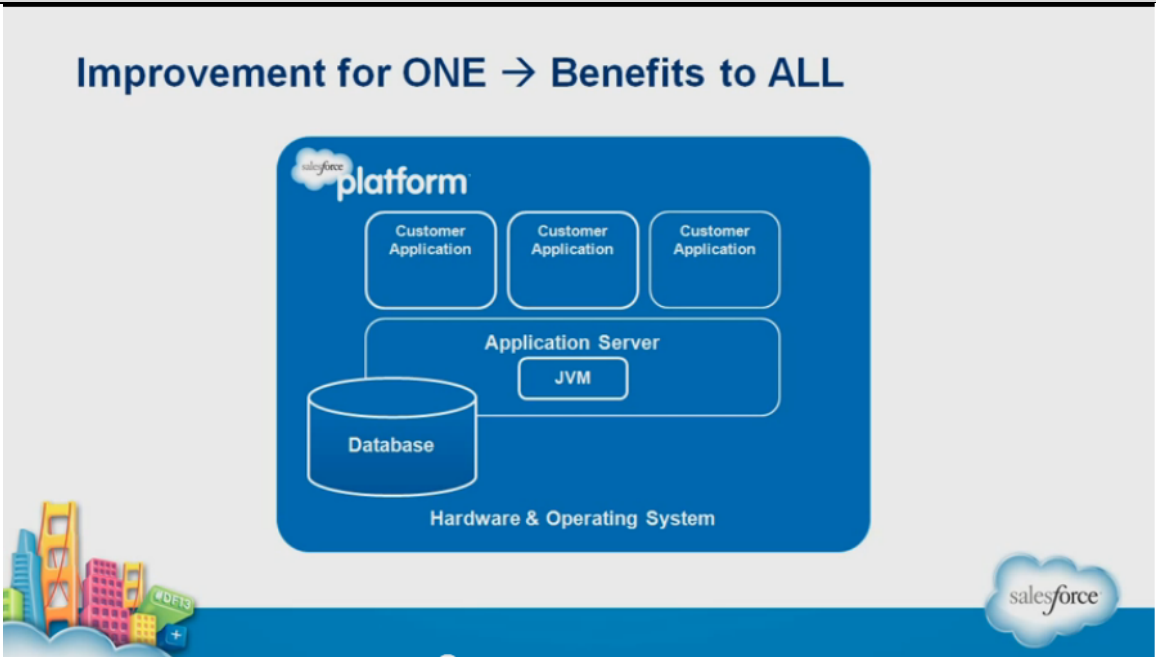
¹³¹ *Id.* at 8:17

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Figure 20A. Storage of a Salesforce Data Center¹³²¹³² *Id.* at 11:33

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Asserted Claims and Limitations	Corresponding Elements in Accused Instrumentalities
	 <p>Figure 20B. Application Server of a Salesforce Data Center¹³³</p>
21. A method for dynamically generating an application using a server computer and one or more	Infringing Instrumentalities Salesforce.com Inc. (hereafter "Salesforce") is a cloud computing company headquartered in San Francisco, California. The Salesforce website is located online at http://www.salesforce.com/ . Salesforce customer relationship management (CRM) products include Sales Cloud, ¹³⁴ Service

¹³³ *Id.* at 21:30

¹³⁴ <http://www.salesforce.com/sales-cloud/>

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Asserted Claims and Limitations	Corresponding Elements in Accused Instrumentalities
client computers connected to the server computer over a computer network, the method comprising:	<p>Cloud,¹³⁵ Marketing Cloud, and ExactTarget Marketing Cloud.¹³⁶ Salesforce application development platforms include the Force.com platform and the Salesforce1 platform.¹³⁷ The Salesforce1 platform includes the Force.com platform.¹³⁸</p> <p>The Salesforce1 platform is an application development platform that provides software development environments and tools, which help platform users develop and deploy mobile apps, desktop applications, and web-based applications.¹³⁹ The Salesforce1 platform includes,¹⁴⁰ among others, the Force.com platform¹⁴¹, the Site.com platform¹⁴², and the Database.com platform¹⁴³.</p> <p>The Force.com platform is a cloud computing platform that enables its users to develop, package, deploy, and use software applications, including mobile apps, desktop applications, and web-based applications.¹⁴⁴ Force.com users can use traditional development practices for creating on-demand applications.¹⁴⁵</p> <p>Direct Infringement</p> <p>Salesforce's internal development, use, creation, and testing of Salesforce products, including Sales Cloud, Service Cloud, Marketing Cloud, and ExactTarget Marketing Cloud, where such use, creation, development, and testing of such products dynamically generates an application accessed by a</p>

¹³⁵ <http://www.salesforce.com/service-cloud/>

¹³⁶ <http://www.salesforce.com/marketing-cloud/>; <http://www.exacttarget.com/>

¹³⁷ <http://www.salesforce.com/platform/>

¹³⁸ <https://developer.salesforce.com/platform/>: "Building amazing apps for any device"

¹³⁹ <http://www.salesforce.com/platform/overview/>

¹⁴⁰ <https://developer.salesforce.com/platform/>

¹⁴¹ <http://developer.force.com/>

¹⁴² <http://www.site.com/>

¹⁴³ <http://www.salesforce.com/platform/database/>

¹⁴⁴ [http://wiki.developerforce.com/page/About: "What is Force.com"](http://wiki.developerforce.com/page/About:What_is_Force.com); <http://developer.force.com/gettingstarted>: "About the Froce.com Platform"

¹⁴⁵ http://wiki.developerforce.com/page/An_Introduction_to_Force.com_Metadata: "Abstract"

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Asserted Claims and Limitations	Corresponding Elements in Accused Instrumentalities
	<p>Salesforce employee through a web browser on a Salesforce computer constitutes direct infringement of Claim 21 of the '482 patent. As Salesforce employee that access a Salesforce1 and/or Force.com third-party application through a web browser on a Salesforce computer constitutes direct infringement of Claim 21 of the '482 patent.</p>

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	Closed	Commit	Upside	Pipeline
Total: 3 Months Change	\$1,810,500.00	\$1,192,905.00	\$1,594,690.00	\$4,909,825.00
- December FY 2012	\$852,500.00	\$830,905.00	\$809,450.00	\$3,672,825.00
Cindy Long	\$108,000.00	\$12,348.00	\$20,000.00	\$109,000.00
Ely McCrane	\$112,000.00	\$9,000.00	\$164,000.00	\$48,000.00
John Maxwell	\$187,000.00	\$85,000.00	\$243,000.00	\$27,500.00
Kasey Lee	\$205,000.00	\$21,229.00	\$162,450.00	\$35,000.00
Wendy Johnson	\$95,000.00	\$43,326.00	\$220,000.00	\$3,139,000.00
My Opportunities	\$145,500.00	\$660,000.00	\$0.00	\$314,325.00
+ January FY 2013	\$622,500.00	\$220,000.00	\$421,000.00	\$727,000.00
+ February FY 2013	\$335,500.00	\$142,000.00	\$364,240.00	\$510,000.00

Figure 1. Sales Cloud Executing Within a Web Browser Environment¹⁴⁶¹⁴⁶ Salesforce Video: "Sales Cloud Overview and Demo" (<http://www.youtube.com/watch?v=fadLk7-SPVA&list=PL50274E7562393953>) at 0:36

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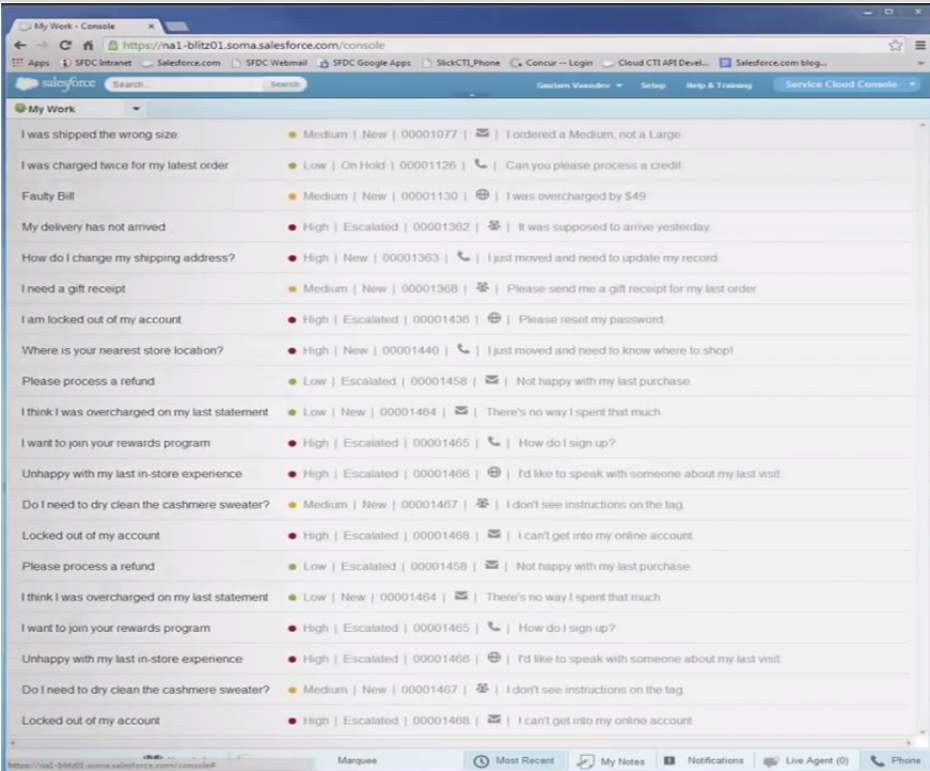


Figure 2A. Service Cloud Executing Within a Web Browser Environment¹⁴⁷

¹⁴⁷ Salesforce Video: "Service Cloud Overview and Demo" (<http://www.youtube.com/watch?v=hwKFv9X1yhU>) at 0:52

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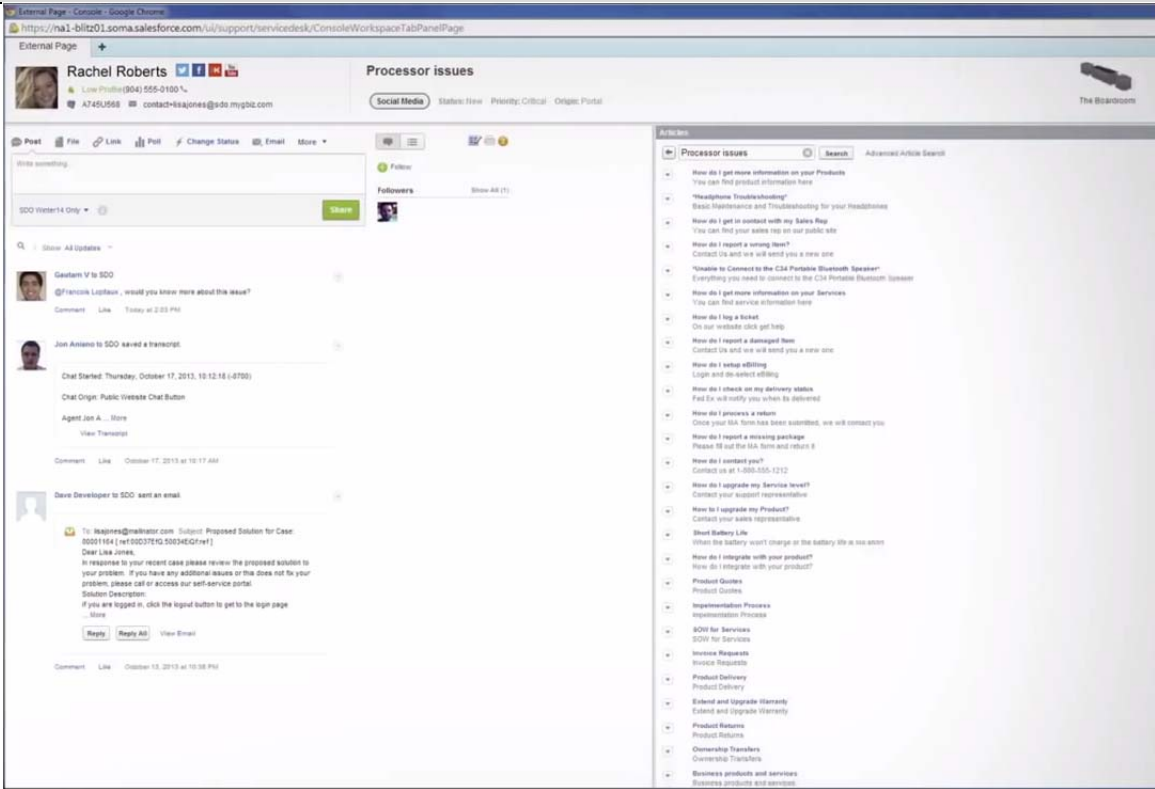


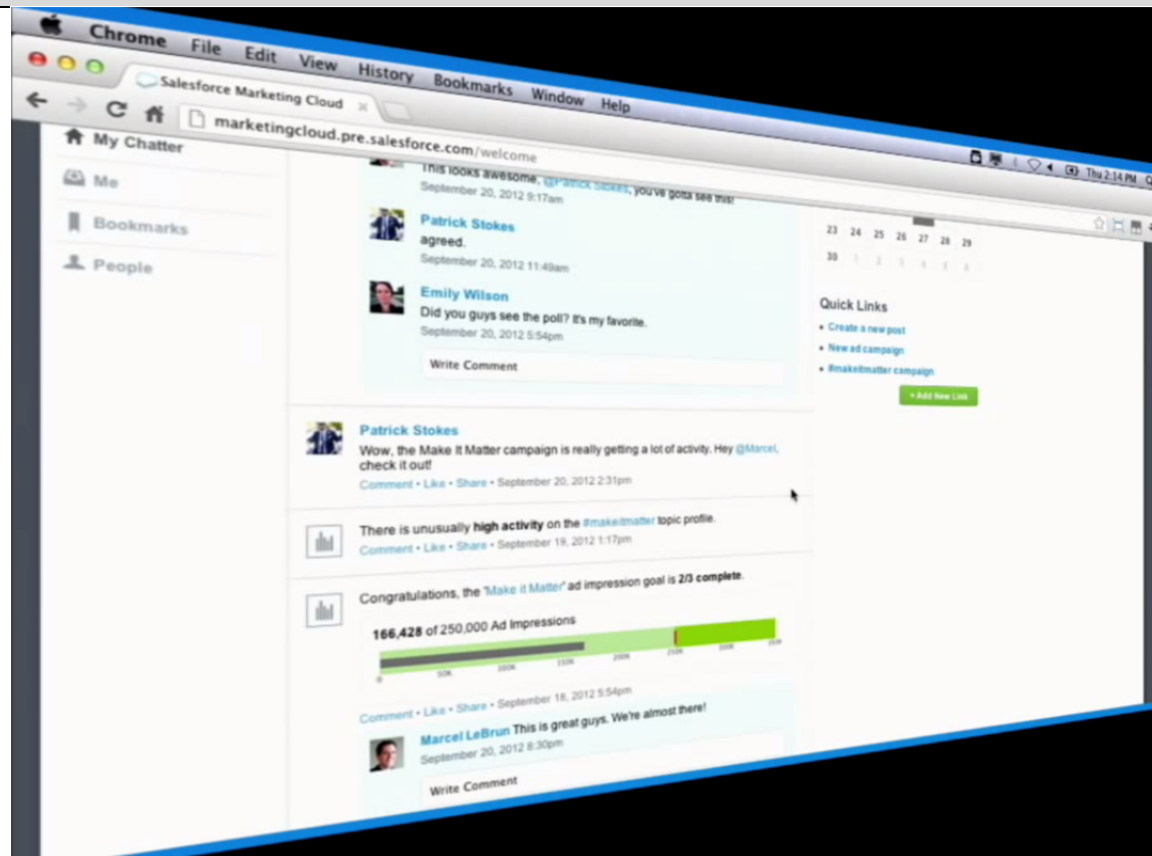
Figure 2B. Service Cloud Executing Within a Web Browser Environment¹⁴⁸

¹⁴⁸ *Id.*

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Figure 3A. Marketing Cloud Executing Within a Web Browser Environment¹⁴⁹

¹⁴⁹ Salesforce Video: "Salesforce Market Cloud Demo" (<http://www.youtube.com/watch?v=6C7FYZvSKYc>) at 2:08.

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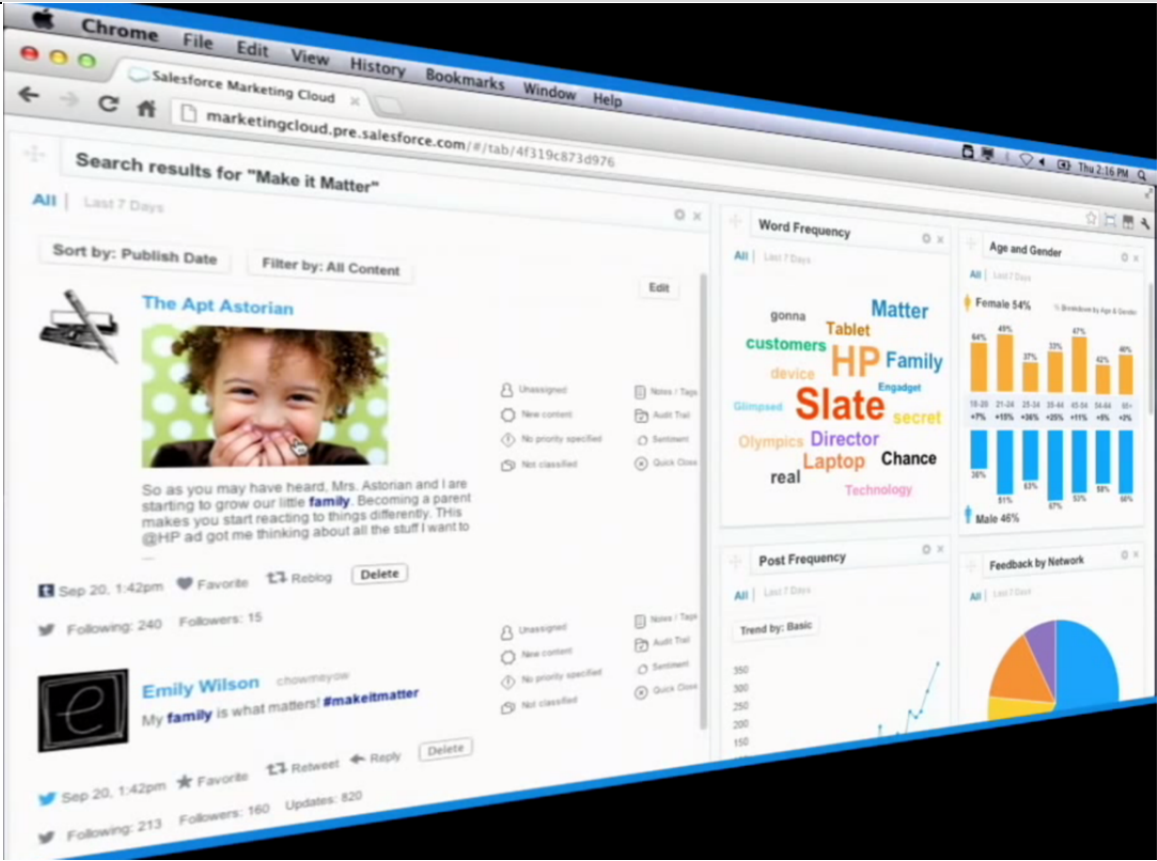


Figure 3B. Marketing Cloud Executing Within a Web Browser Environment¹⁵⁰

¹⁵⁰ *Id.* at 4:10.

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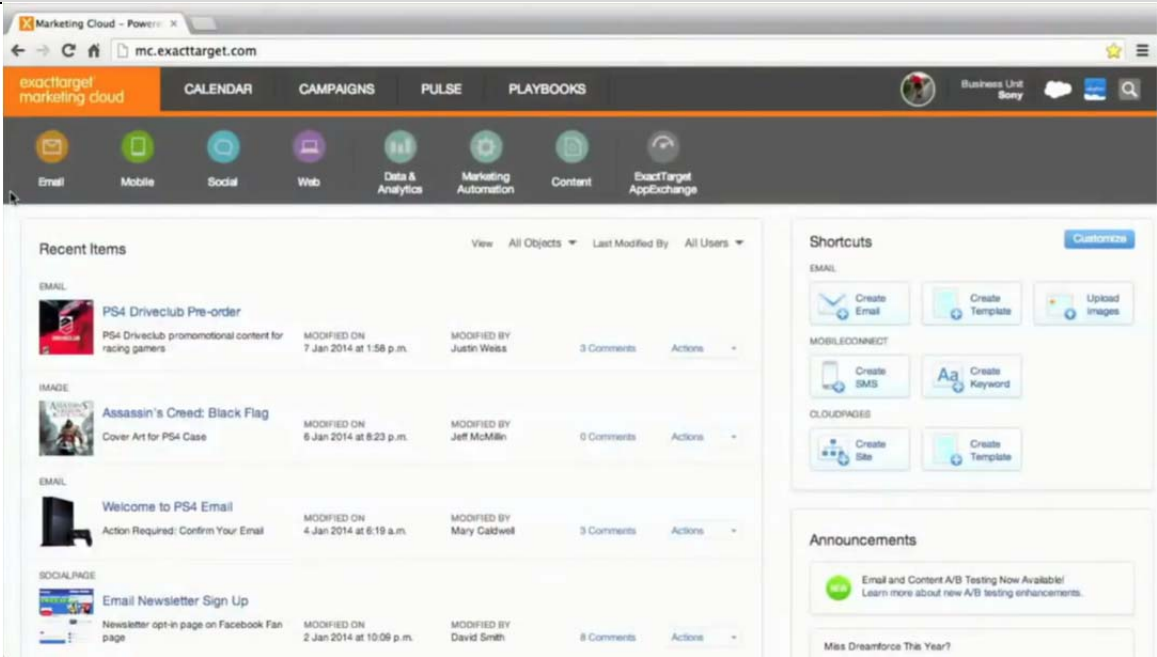


Figure 4A. ExactTarget Marketing Cloud Executing Within a Web Browser Environment¹⁵¹

¹⁵¹ Salesforce Video: "ExactTarget Marketing Cloud Demo" (<http://www.youtube.com/watch?v=ZpoIaIwF9eg>) at 9:07

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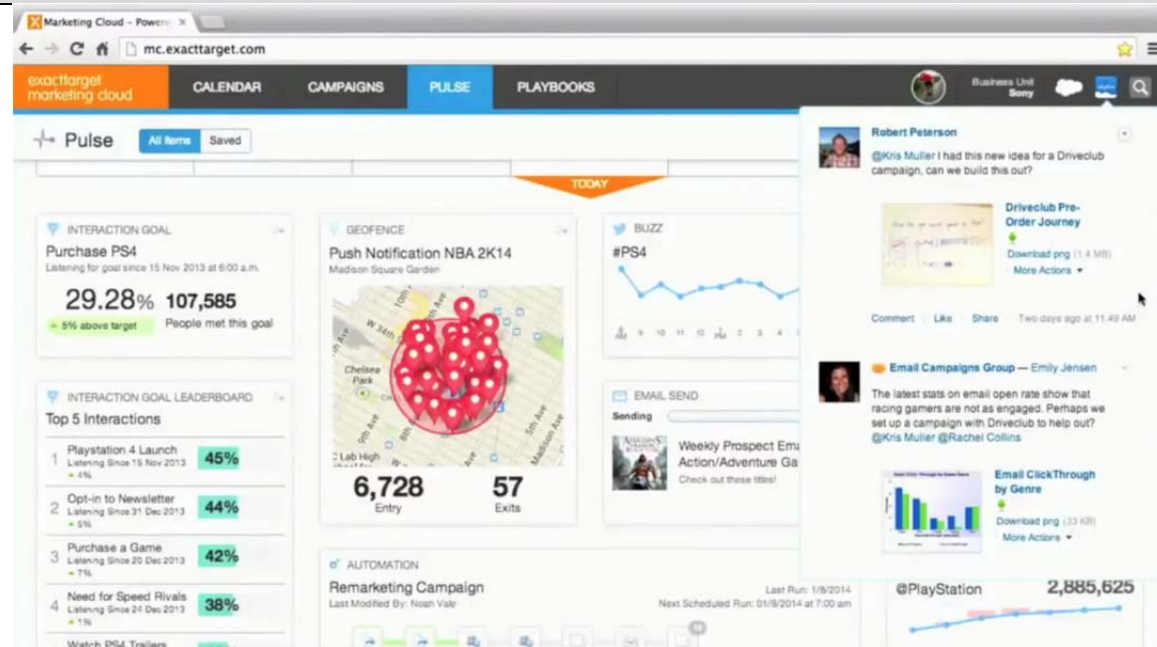


Figure 4B. ExactTarget Marketing Cloud Executing Within a Web Browser Environment¹⁵²

Salesforce's internal development, use, creation, and testing of additional applications that utilize the Force.com platform and/or the Salesforce1 platform where such use, creation, development, and testing dynamically generates an application accessed by a Salesforce employee through a web browser on a client computer constitutes direct infringement of Claim 21 of the '482 patent.

¹⁵² Salesforce Video: "ExactTarget Marketing Cloud Demo" (<http://www.youtube.com/watch?v=ZpoIaIwF9eg>) at 9:53

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	<p>Indirect Infringement</p> <p>By making Salesforce products, including Sales Cloud, Service Cloud, Marketing Cloud, and ExactTarget Marketing Cloud, available for access through a web browser on a user client computer to third-party users, and by promoting and providing training and instruction on the use and access to such third-party users, Salesforce induces infringement of Claim 21 of the '482 patent.</p> <p>By making the Force.com platform and/or the Salesforce1 platform available for the development, deployment, and use of third-party applications with the capability for access through a web browser on a user client computer available to third-party end users and/or developer users, and by promoting, providing training and instruction on the use, access, and development of such third-party applications, Salesforce induces infringement of Claim 21 of the '482 patent.</p>

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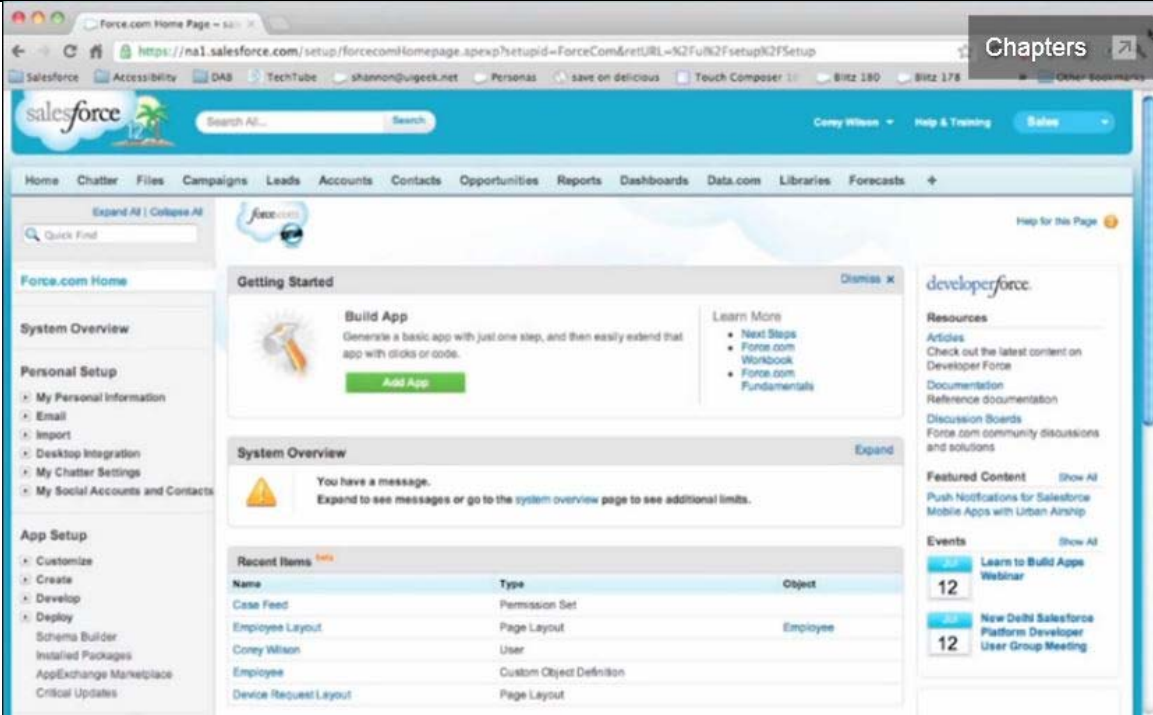


Figure 5A. Building a Third-Party Application on the Salesforce1 Platform¹⁵³

¹⁵³ Salesforce Video: "Learn to Build Apps Webinar" (<http://www.youtube.com/watch?v=2Bkbr-q00hs&list=PLF5C1A684ED0DD117>) at 7:35

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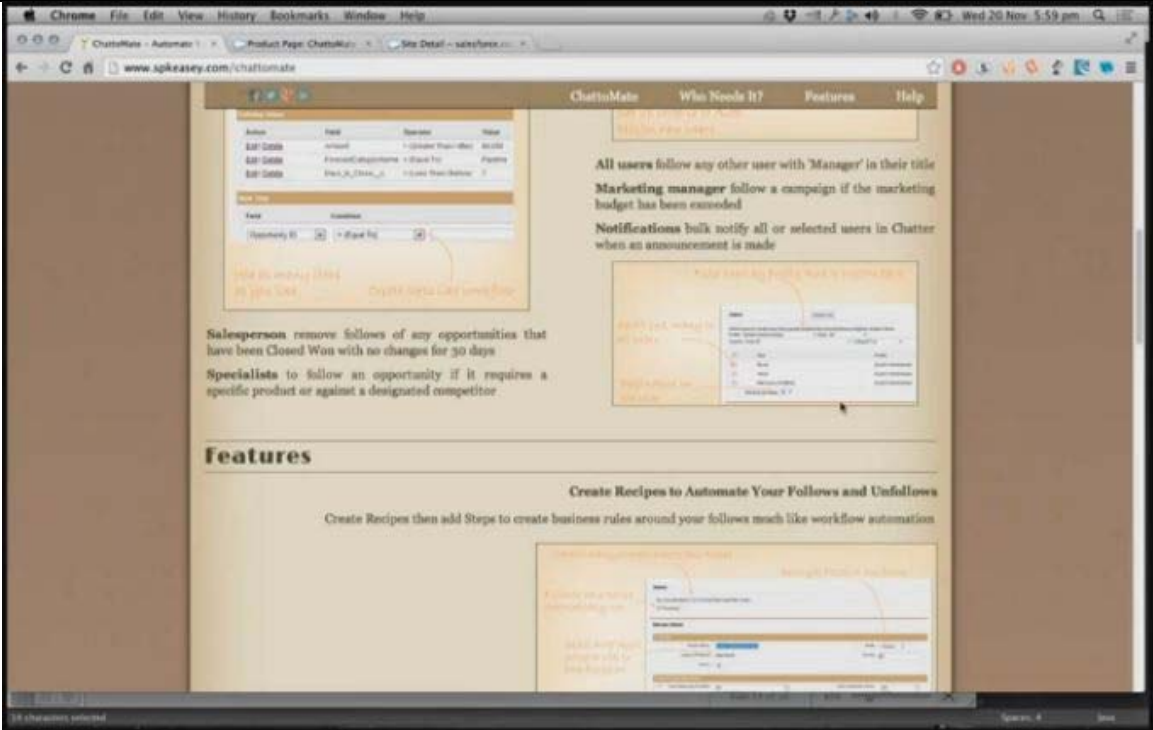


Figure 5B. A Sample Third-Party Application Executing Within a Web Browser Environment¹⁵⁴

¹⁵⁴ Dreamforce Video: "Developing Public Websites with Force.com Sites" (http://www.youtube.com/watch?v=icfkAeMf_e4) at 43:03

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Figure 5C. A Sample Third-Party Application Executing Within a Web Browser Environment ¹⁵⁵

¹⁵⁵ <http://wiki.developerforce.com/page/WebSites>

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Asserted Claims and Limitations	Corresponding Elements in Accused Instrumentalities
	<p>Salesforce's customers who have developed and/or deployed third-party applications on the Salesforce1 platform or the Force.com platform include, for example, Thompson Reuters,¹⁵⁶ Living Social,¹⁵⁷ Yamaha,¹⁵⁸ and many others.¹⁵⁹</p> <p>When used by Salesforce employees or third-parties to access either Salesforce (e.g., Sales Cloud, Service Cloud, ExactTarget Marketing Cloud, and Marketing Cloud) and/or third-party browser-based applications, the Force.com platform and Salesforce1 platform are embodiments of a method <u>for dynamically generating an application using a server computer and one or more client computers connected to the server computer over a computer network</u>.</p>

¹⁵⁶ http://www.salesforce.com/assets/videos/sales-customers.jsp?videoId=ctQ6u1jXY0M&display_type=lb&contentWidth=790&contentPadding=30

¹⁵⁷ <http://www.salesforce.com/customers/stories/livingsocial.jsp>

¹⁵⁸ <http://www.salesforce.com/customers/stories/yamaha.jsp>

¹⁵⁹ <http://www.salesforce.com/customers/>

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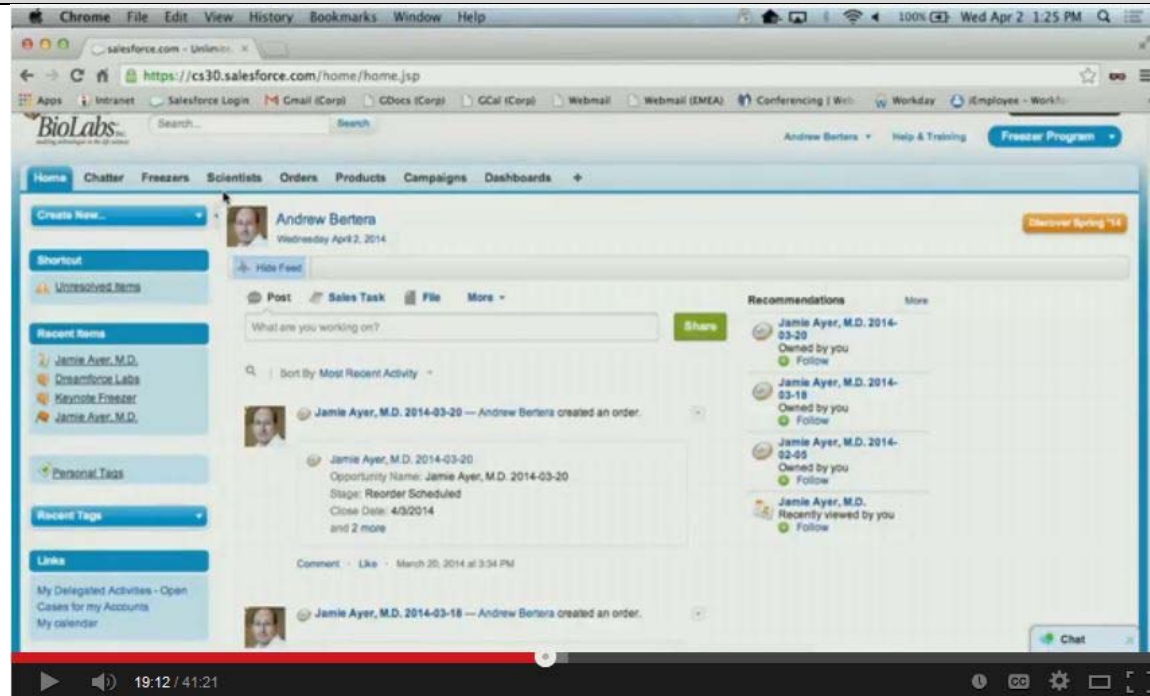


Figure 6. Developing a Third-Party Application on the Salesforce1 Platform¹⁶⁰

A Sales Cloud user can customize Sales Cloud functionalities through the Sales Cloud user interface.¹⁶¹ For example, an Administrator user of Sales Cloud can (1) create queues, (2) create lead

¹⁶⁰ Salesforce Video: "Salesforce1 Platform: Building Next Generation Apps, IT and Devices - Salesforce World Tour Boston" (<http://www.youtube.com/watch?v=AJJOHXZi3Mg>) at 18:29-22:15

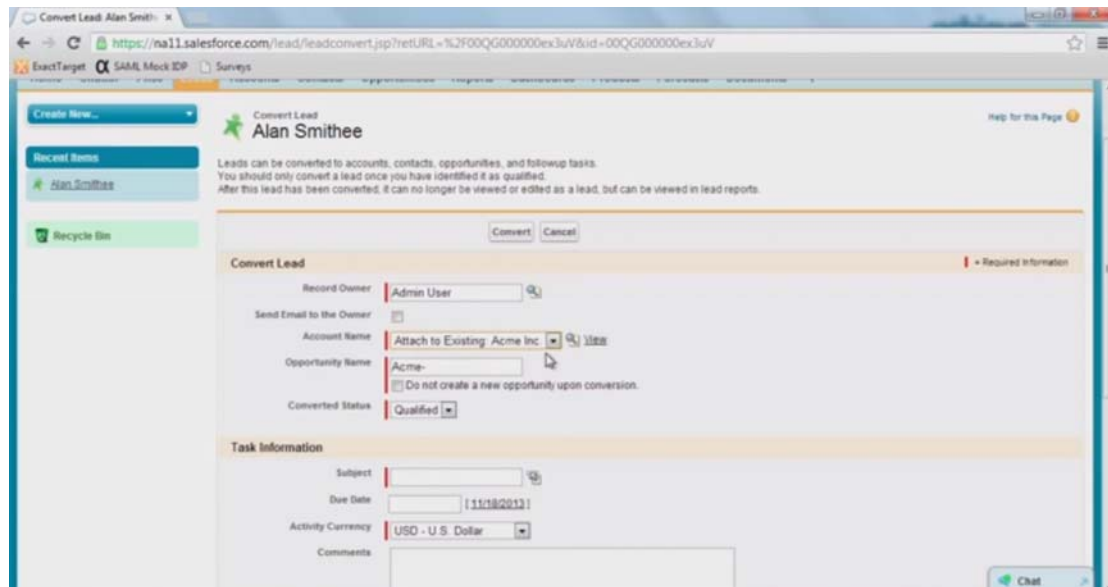
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assignment rules, (3) create sales processes, and (4) create opportunity validation rules through the Sales Cloud user interface.¹⁶² The customizations are dynamically incorporated into the application accessed by one or more client computers connected to the server computer over a computer network.

Figure 7A. Creating Lead Assignment Rules in Sales Cloud¹⁶³

¹⁶¹ Salesforce Video: "Opportunities and Quotes - Sales Cloud Demo" (<http://www.youtube.com/watch?v=JsxhG6d1YRs&list=PL50274E7562393953>) at 0:21-0:27

¹⁶² Dreamforce Video: "Hands-on-Training: Get Started with Sales Cloud Administration" (<http://www.youtube.com/watch?v=MSp61khlP9s>)

¹⁶³ *Id.* at 17:42

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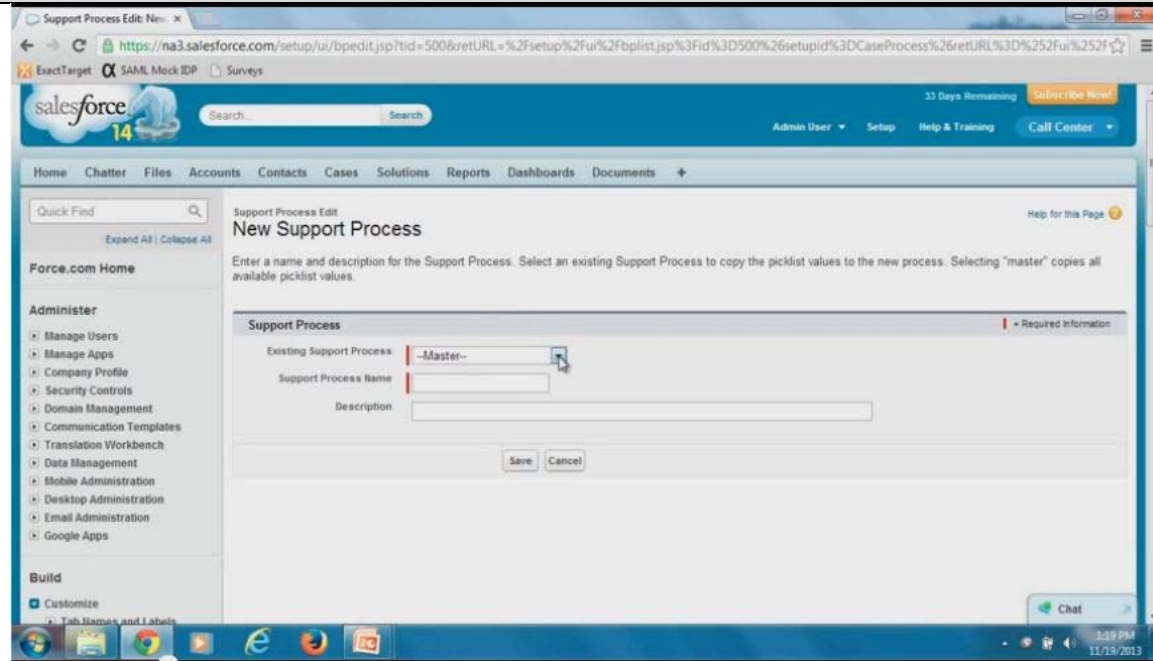


Figure 7B. Creating Sales Processes in Sales Cloud¹⁶⁴

A Service Cloud user can customize Service Cloud functionalities through the Service Cloud user interface. For example, an Administrator user of Service Cloud can (1) create a support process, (2) configure web-to-case, (3) create a case queue and an assignment rule, (4) create a case escalation rule, and (5) create a workflow rule on a case object through the Service Cloud user interface.¹⁶⁵ The Service Cloud user interface includes a "Customize" area for customizing Service Cloud

¹⁶⁴ *Id.* at 29:18

¹⁶⁵ Dreamforce Video: "Hands-on-Training: Get Started with Service Cloud Administration" (<http://www.youtube.com/watch?v=fJFIqtlscI>) at 0:21-0:27

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functionalities. The customizations are dynamically incorporated into the application accessed by one or more client computers connected to the server computer over a computer network.

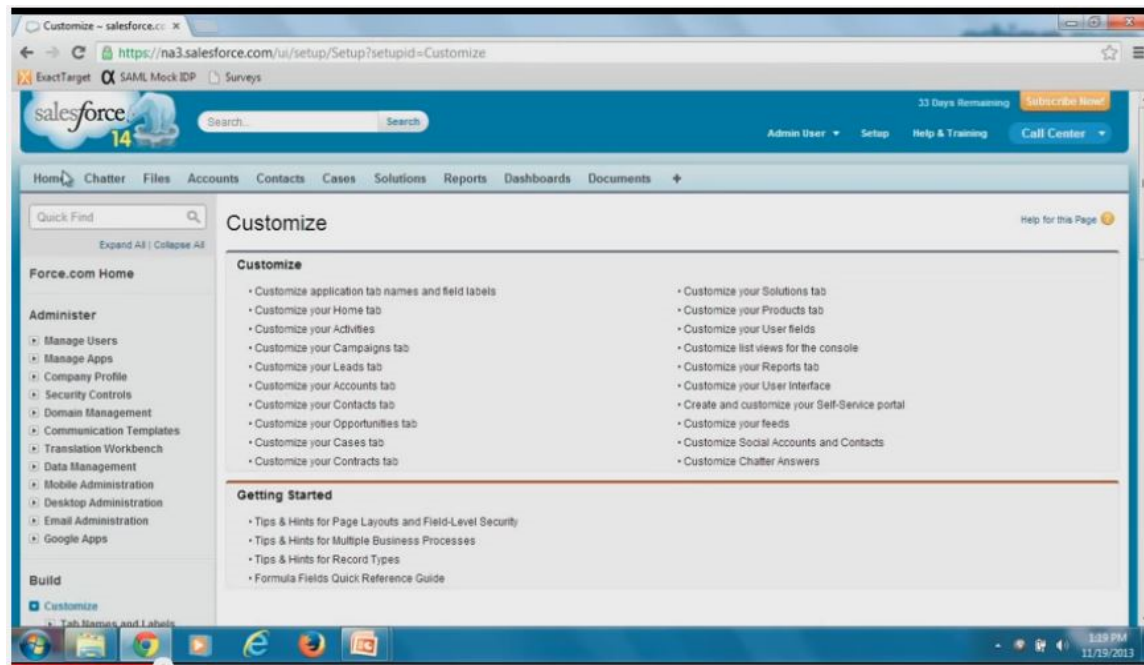


Figure 8. The "Customize" Area of the Service Cloud User Interface¹⁶⁶

An ExactTarget Marketing Cloud user can customize ExactTarget Marketing Cloud functionalities through the ExactTarget Fuel platform.¹⁶⁷ ExactTarget Marketing Cloud is an application container

¹⁶⁶ *Id.* at 17:08

¹⁶⁷ <http://www.exacttarget.com/products/platform/fuel-platform>

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	<p>that contains a number of Salesforce applications, including Email, Mobile, and Social applications.¹⁶⁸ The ExactTarget Fuel platform opens ExactTarget Marketing Cloud to third-party development to create third-party applications that fully integrate with ExactTarget Marketing Cloud functionalities, including common calendaring, campaign management, and analytics frameworks.¹⁶⁹ The customizations are dynamically incorporated into the application accessed by one or more client computers connected to the server computer over a computer network.</p>

¹⁶⁸ <http://www.exacttarget.com/products>

¹⁶⁹ Dreamforce Video: "Building Apps for the ExactTarget Marketing Cloud" (<http://www.youtube.com/watch?v=b6N7PDOr73o>)

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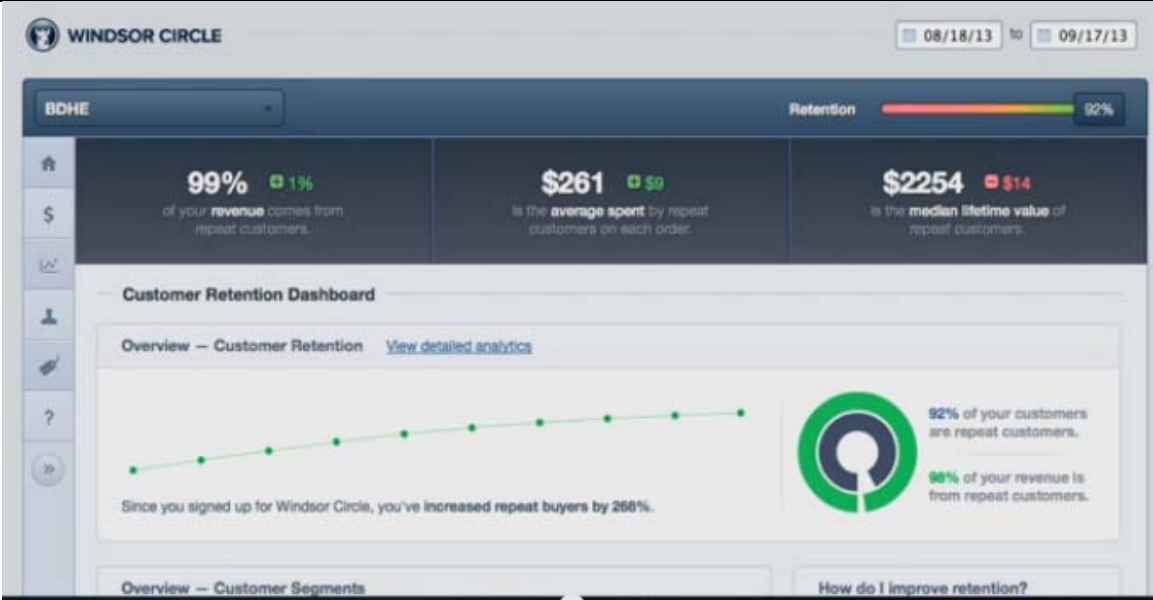


Figure 9A. A Third-Party Application Built for ExactTarget Marketing Cloud¹⁷⁰

¹⁷⁰ *Id.* at 21:48

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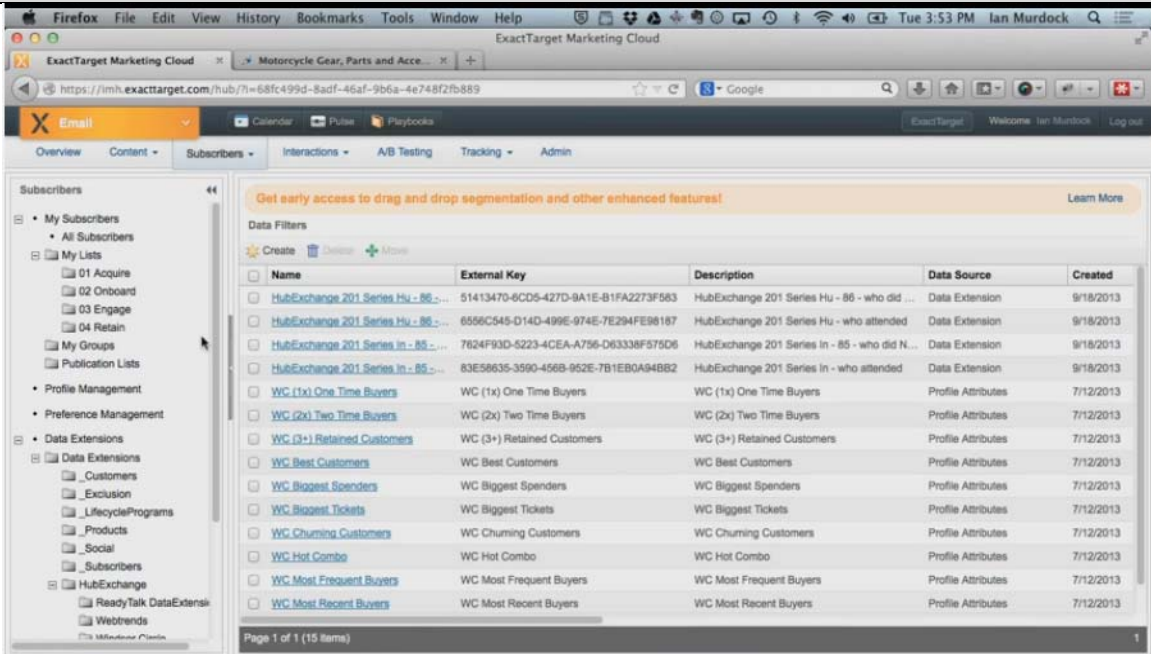


Figure 9B. A Third-Party Application Integrated With ExactTarget Marketing Cloud Applications¹⁷¹

An application developed on the Force.com platform or Salesforce1 platform (e.g., Sales Cloud, Service Cloud, Marketing Cloud, and ExactTarget Marketing Cloud) implements a standard or customized user interface.¹⁷² The customizations are dynamically incorporated into the application accessed by one or more client computers connected to the server computer over a computer network.

¹⁷¹ *Id.* at 22:59

¹⁷² http://wiki.developerforce.com/page/User_Interface

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21-1 providing a first layer containing information about the unique aspects of a particular application;	<p>Salesforce servers store information about unique aspects of a particular application and <u>provide</u> such information to customers, developers, end users, and Salesforce employees.</p> <p>The app logic (e.g., business logic) of a Salesforce product¹⁷³ or a third-party application¹⁷⁴ developed and deployed on the Force.com platform or the Salesforce1 platform is an embodiment of <u>a first layer containing information about the unique aspects of a particular application</u>.</p> <p>The Salesforce1 platform uses the Force.com platform.¹⁷⁵ The Force.com platform implements a Model-View-Controller (MVC) architecture through Visualforce based on the separation of data presentation from data manipulation. In such an architecture, the “model” represents the data model, the “view” represents the presentation of the data (user interface), and the “controller” represents the business logic that manipulates the data and controls the user interface.¹⁷⁶ The “view” (e.g., user interface) and the “controller” (e.g., business logic) thus belong to two different layers.¹⁷⁷</p> <p>The Force.com and Database.com platforms offer two approaches for implementing business logic for a third-party application developed on the Force.com platform or the Salesforce1 platform.¹⁷⁸ Standard business logic may be implemented using point-and-click declarative features such as formulas, workflow rules, approval processes, and visual workflow.¹⁷⁹ Custom business logic may be implemented using Apex code.¹⁸⁰</p>

¹⁷³ See, Figures 1-4B

¹⁷⁴ See, Figures 5B-5C

¹⁷⁵ http://help.salesforce.com/apex/HTViewSolution?id=000187601&language=en_US: "Salesforce1 Architecture Overview"

¹⁷⁶ http://wiki.developerforce.com/page/Visualforce:_An_Overview: "Developing with Visualforce"

¹⁷⁷ Reference [1], page 8, "Force.com Stack Overview"

¹⁷⁸ http://wiki.developerforce.com/page/App_Logic; https://developer.salesforce.com/page/App_Logic

¹⁷⁹ http://wiki.developerforce.com/page/App_Logic: "Point-and-Click App Logic"

¹⁸⁰ http://wiki.developerforce.com/page/App_Logic: "Apex Code"

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Asserted Claims and Limitations	Corresponding Elements in Accused Instrumentalities
	<p>Salesforce products, including Sales Cloud, Service Cloud, Marketing Cloud, and ExactTarget Marketing Cloud, implements various functionalities embodying the app or business logic of the product. For example, Sales Cloud implements business logic relating to sales.¹⁸¹ Service Cloud implements business logic relating to customer service.¹⁸² Marketing Cloud and ExactTarget Marketing Cloud implement business logic relating to marketing.¹⁸³</p> <p>On information and belief, the static and/or dynamic content of a web-based application developed on the Site.com platform is an embodiment of <u>a first layer associated with the server computer containing information about the unique aspects of a particular application.</u></p> <p>Static and/or dynamic content of a web page can be implemented using the drag-and-drop studio feature of the Site.com platform.¹⁸⁴</p>
21-2 providing a second layer containing information about the user interface and functions common to a variety of applications, wherein a particular application is generated based on the data in the first and second	<p>Salesforce servers store information about the user interface and functions common to a variety of applications and <u>provide</u> such information available to customers, developers, end users, and Salesforce employees.</p> <p>The user interface of a Salesforce product¹⁸⁵ or a third-party application¹⁸⁶ developed and deployed on the Force.com platform or the Salesforce1 platform is an embodiment of <u>a second layer containing information about the user interface and functions common to a variety of applications.</u></p> <p>A Salesforce product, including Sales Cloud, Service Cloud, Marketing Cloud, and ExactTarget Marketing Cloud, implements a web-based user interface for accessing the product.¹⁸⁷ The web-based</p>

¹⁸¹ Salesforce Video: "Sales Cloud Overview and Demo" (<http://www.youtube.com/watch?v=yz2ec1J6QQA>)

¹⁸² Salesforce Video: "Service Cloud Overview and Demo" (<http://www.youtube.com/watch?v=hwKFv9X1yhU>)

¹⁸³ Salesforce Video: "Salesforce Marketing Cloud Demo" (<http://www.youtube.com/watch?v=6C7FYZvSKYc>); Salesforce Video: "ExactTarget Marketing Cloud Overview Demo" (<http://www.youtube.com/watch?v=x1wwxcoA82o>)

¹⁸⁴ <http://www.site.com/features>: "Design the next big thing - Drag-and-drop studio"; <http://www.site.com/home>: "What is Site.com?" video

¹⁸⁵ See, Figures 1-4B

¹⁸⁶ See, Figures 5B-5C

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Asserted Claims and Limitations	Corresponding Elements in Accused Instrumentalities
layers;	<p>user interface can be accessed through a web browser on a user client computer.</p> <p>A third-party application can implement a web-based user interface for accessing the application.¹⁸⁸ The Force.com platform offers a standard user interface with one or more page layouts that correspond to an application's objects. The standard user interface includes an embodiment of <u>functions common to a variety of applications</u>.¹⁸⁹ Customized user interfaces may be implemented using Visualforce.¹⁹⁰ User interfaces may be constructed using native Visualforce markup and standard Web development technologies such as HTML5, CSS, JavaScript, and jQuery.</p>

¹⁸⁷ See, Figures 1-4B

¹⁸⁸ See, Figures 5B-5C

¹⁸⁹ http://wiki.developerforce.com/page/User_Interface

¹⁹⁰ http://wiki.developerforce.com/page/Visualforce:_An_Overview; "Developing with Visualforce"; Salesforce Video: "Introduction to Visualforce" (<http://www.youtube.com/watch?v=wo74xdvtvUE>); Salesforce Video: "Advanced Visualforce Webinar" (<http://www.youtube.com/watch?v=IbS6rmPZkbM>)

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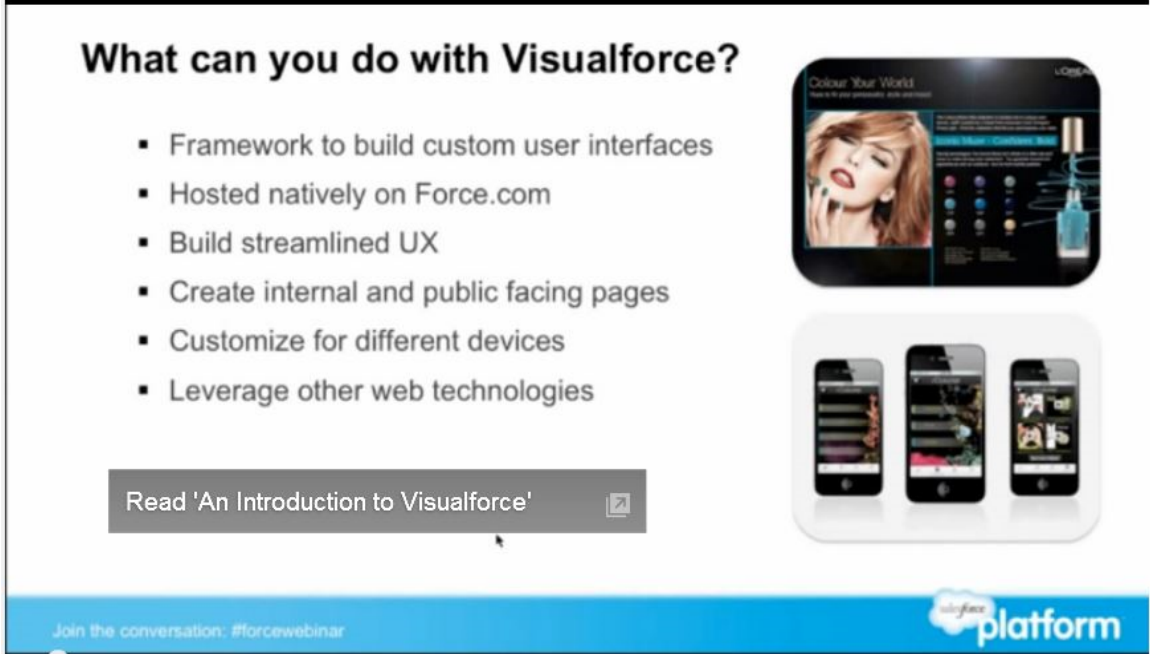

Asserted Claims and Limitations	Corresponding Elements in Accused Instrumentalities
	 <p>What can you do with Visualforce?</p> <ul style="list-style-type: none"> ▪ Framework to build custom user interfaces ▪ Hosted natively on Force.com ▪ Build streamlined UX ▪ Create internal and public facing pages ▪ Customize for different devices ▪ Leverage other web technologies <p>Read 'An Introduction to Visualforce'</p> <p>Join the conversation: #forcewebinar</p> <p>salesforce platform</p>

Figure 12. Visualforce Functionalities¹⁹¹

¹⁹¹ Salesforce Video: "Introduction to Visualforce" (<http://www.youtube.com/watch?v=wo74xdvtvUE>) 2:06-2:38

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Asserted Claims and Limitations	Corresponding Elements in Accused Instrumentalities
	 <p data-bbox="793 1242 1682 1284">Figure 13. Example User Interface Constructed Using Visualforce¹⁹²</p> <p data-bbox="583 1300 1814 1333">The Force.com platform implements a Model-View-Controller (MVC) architecture based on the</p>

¹⁹² http://wiki.developerforce.com/page/User_Interface

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Asserted Claims and Limitations	Corresponding Elements in Accused Instrumentalities
	<p>separation of data presentation from data manipulation. In such an architecture, the “model” represents the data model, the “view” represents the presentation of the data (user interface), and the “controller” represents the business logic that manipulates the data and controls the user interface. The “view” (e.g., user interface) and the “controller” (e.g., business logic) thus belong to two different layers.¹⁹³</p> <p>On information and belief, a web page of a web-based application developed on the Site.com platform is an embodiment of <u>a second layer associated with the server computer containing information about the user interface and functions common to a variety of applications.</u></p> <p>The user-interface components of a web page can be implemented using the drag-and-drop studio feature of the Site.com platform.¹⁹⁴</p> <p>A Salesforce product or a third-party application developed and deployed on the Force.com platform or the Salesforce1 platform is generated based on its user interface and app logic, which is an embodiment of <u>a particular application is generated based on the data in the first and second layers..</u></p> <p>For example, Salesforce products, including Sales Cloud, Service Cloud, Marketing Cloud, and ExactTarget Marketing Cloud, implement a web-based user interface for accessing the product,¹⁹⁵ as well as functionalities that embody the app logic or business logic of the product.</p> <p>Third-party applications developed and deployed on the Force.com platform or the Salesforce1 platform can implement a web-based user interface for accessing the application,¹⁹⁶ as well as functionalities that embody the app logic or business logic of the application.</p> <p>On information and belief, a web-based application developed on the Site.com platform is</p>

¹⁹³ Reference [1], page 8, “Force.com Stack Overview”

¹⁹⁴ <http://www.site.com/features>: “Design the next big thing - Drag-and-drop studio”; <http://www.site.com/home>: “What is Site.com?” video

¹⁹⁵ See, Figures 1-4B

¹⁹⁶ See, Figures 5B-5C



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Asserted Claims and Limitations	Corresponding Elements in Accused Instrumentalities
	dynamically generated based on its user interface (e.g., web pages) and static and/or dynamic content, which is an embodiment of <u>a particular application being generated based on the data in both the first and second layers.</u>
21-3 establishing a connection between a client computer and the server computer;	<p>A Salesforce server computer hosting the Force.com platform or the Salesforce1 platform is an embodiment of <u>a server computer</u>. A third-party or Salesforce employee operating a computer executing a web browser is an embodiment of <u>a client computer</u>. When a third-party or Salesforce employee end user requests access to the Salesforce servers using a web browser, the Salesforce server and client computer <u>establish a connection between a client computer and the server computer</u> over a computer network, such as the Internet.</p> <p>The Force.com platform and the Salesforce1 platform are hosted by at least one server.</p> <p>The Salesforce1 platform uses the Force.com platform, with all application logic and database storage provided by Salesforce's hosted application servers.¹⁹⁷</p> <p>The Force.com platform is a cloud application development platform that powers many Salesforce cloud applications (e.g., Sales Cloud, Service Cloud, Marketing Cloud, ExactTarget Marketing Cloud, etc.) as well third-party applications built by Salesforce customers.¹⁹⁸ The Force.com platform is a Platform as a Service (PaaS) that is built for cloud computing, with multitenancy inherent to its design.¹⁹⁹ Developer users can build server-side application components using the Force.com Web browser-based development environment.²⁰⁰</p>

¹⁹⁷ http://help.salesforce.com/apex/HTViewSolution?id=000187601&language=en_US: "Salesforce1 Architecture Overview"

¹⁹⁸ https://wiki.developerforce.com/page/Multi_Tenant_Architecture: "Force.com Architecture Overview"

¹⁹⁹ *Id.*: "Force.com Architecture Overview - Multitenant Kernel "

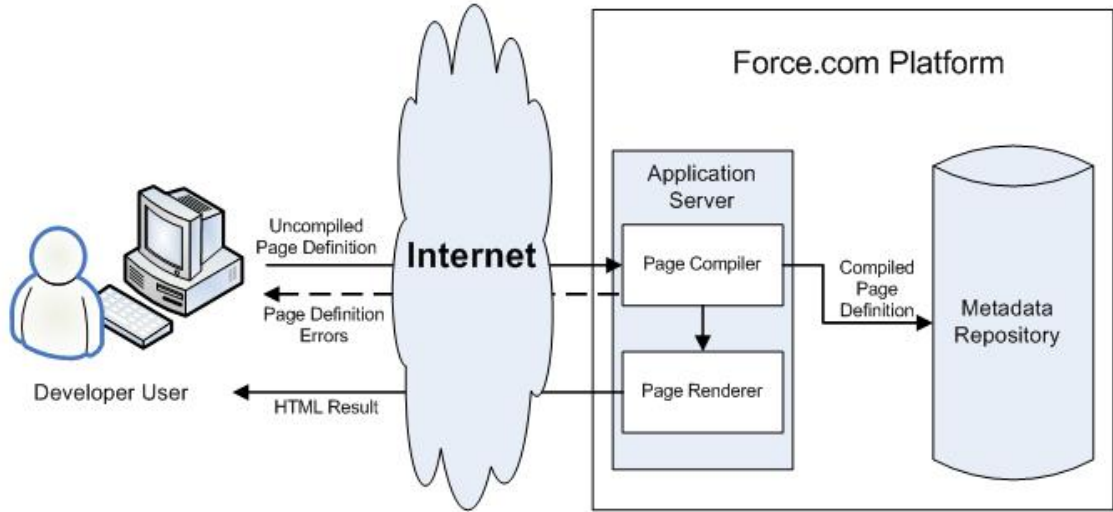
²⁰⁰ *Id.*: "Multitenant App Development - The Force.com Browser-Based Development Environment"

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Asserted Claims and Limitations	Corresponding Elements in Accused Instrumentalities
	<div><div><p>Multitenant:</p><ul style="list-style-type: none">- system catalog- caches- query optimizer and statistics- app dev features</div><div></div><div><div><div>APPLICATION SERVER</div><div></div><div>RDBMS</div></div><div><p>Single tenant:</p><ul style="list-style-type: none">- system catalog- caches- query optimizer and statistics- app dev features</div></div></div> <p>Figure 10. The Force.com Platform Multitenant Architecture²⁰¹</p>

²⁰¹ *Id.*: "Force.com Architecture Overview - Multitenant Kernel"

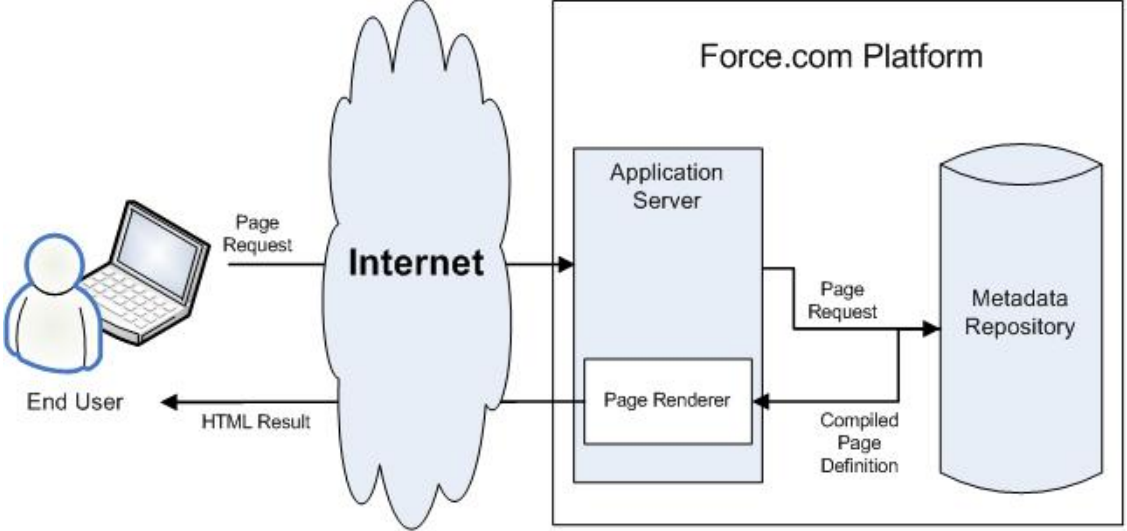
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	 <p>The diagram illustrates the Force.com Platform Architecture. A Developer User (represented by a person icon and a computer) interacts with the Internet (represented by a cloud). The Internet connects to the Force.com Platform, which consists of an Application Server. Inside the Application Server, there is a Page Compiler and a Page Renderer. The Page Compiler receives an Uncompiled Page Definition from the Internet and sends Page Definition Errors back to the Internet. The Page Compiler also sends a Compiled Page Definition to a Metadata Repository (represented by a cylinder). The Page Renderer receives the Compiled Page Definition from the Page Compiler and sends an HTML Result back to the Internet, which then delivers it to the Developer User.</p> <p>Figure 11A. The Force.com Platform Architecture²⁰²</p>

²⁰² https://www.salesforce.com/us/developer/docs/pages/Content/pages_intro_architecture.htm

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Asserted Claims and Limitations	Corresponding Elements in Accused Instrumentalities
	 <p data-bbox="905 987 1577 1024">Figure 11B. The Force.com Platform Architecture²⁰³</p> <p data-bbox="583 1040 1892 1187">In 2008, Salesforce migrated to Dell servers with AMD processors running Linux.²⁰⁴ In 2013, Salesforce and Oracle Corp. announced a 9-year partnership in which Salesforce will use Oracle Linux, Oracle Exadata, Oracle Database, and the Java platform to power Salesforce's applications and platforms.²⁰⁵</p> <p data-bbox="583 1203 1839 1273">A Salesforce server computer hosting a Salesforce product, including Sales Cloud, Service Cloud, Marketing Cloud, and ExactTarget Marketing Cloud, in the product's web-based form, is an</p>

²⁰³ *Id.*

²⁰⁴ http://www.theregister.co.uk/2008/07/14/salesforce_sun_server_dell/

²⁰⁵ <http://www.oracle.com/us/corporate/press/1964798>

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	embodiment of <u>a server computer</u> .
21-4 providing a third layer that retrieves the data in the first and second layers in order to generate the functionality and user interface for a particular application for the client computer as the client computer connects to the server computer;	<p>Salesforce servers <u>provide</u> the Force.com runtime engine (kernel) and runtime application generator which are an embodiment of <u>a third layer that retrieves the data in the first and second layers in order to generate the functionality and user interface for a particular application for the client computer as the client computer connects to the server computer</u>.</p> <p>The Salesforce1 platform uses the Force.com platform.²⁰⁶</p> <p>With the Force.com platform, everything exposed to application developers and users is internally represented and stored as metadata (e.g., metadata corresponding to each tenant's customizations and metadata describing the base functionality of an application). At runtime, the Force.com platform's runtime engine uses the metadata to generate the "virtual" application components and the Force.com platform's runtime application generator uses the metadata to render the application components in the interface.²⁰⁷</p> <p>Metadata lies at the heart of the Force.com platform. The Force.com IDE, Force.com Migration Tool, and the browser-based user interface are all powered by metadata. The Force.com platform uses metadata to provide on-demand applications directly in the cloud. On the Force.com platform, metadata defines components including all aspects of Force.com functionality, from the appearance of user interfaces through workflow. Examples of components of metadata include custom user interface created using Visualforce, generated page layouts, and Apex classes for custom application functionality. Just about every aspect of a Force.com application, ranging from workflows to the configuration of database object, is metadata.²⁰⁸</p>

²⁰⁶ http://help.salesforce.com/apex/HTViewSolution?id=000187601&language=en_US: "Salesforce1 Architecture Overview"

²⁰⁷ Reference [1], page 7, paragraphs 2-3

²⁰⁸ http://wiki.developerforce.com/page/An_Introduction_to_Force.com_Metadata: "Metadata and Metadata API - Defining Metadata"

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	<p>The Force.com platform provides a metadata model and Metadata API. Platform metadata describes the applications developed on the Force.com platform, and the Metadata API encompasses a set of methods that provide programmatic access to the configuration and source of the applications developed on the Force.com platform.²⁰⁹ The Force.com IDE²¹⁰ and Force.com Migration Tool²¹¹ are examples of client applications that build upon the Metadata API.</p>

²⁰⁹ http://wiki.developerforce.com/page/An_Introduction_to_Force.com_Metadata: "Abstract"

²¹⁰ http://wiki.developerforce.com/page/Force.com_IDE

²¹¹ http://wiki.developerforce.com/page/Migration_Tool_Guide

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	<div data-bbox="667 423 1816 1073"> <p>Metadata The Foundation for the Real-time Architecture</p> <p>The diagram illustrates the Metadata-Driven Architecture. At the top, a box labeled 'Metadata' contains four categories: Data Model (Fields, Objects, Relationships), User Interface (Forms, Buttons, Links, Layouts), Business Logic (Workflow, Approvals, Validations), and Reporting (Custom Reports, Dashboards). Below this is a blue bar labeled 'Metadata'. Underneath is a red bar labeled 'Multi-Tenant Application Code Base'. To the right, a bracket groups the top four categories as 'Your Customizations' and the red bar as 'Our Code'. The Salesforce logo is in the bottom right corner.</p> </div> <p style="text-align: center;">Figure 14A. Metadata-Driven Architecture²¹²</p> <p>The Salesforce1 and Force.com platform describe the base functionality and user customizations as metadata, including base functionality and user-defined customization of the Salesforce Sales Cloud, Service Cloud, Marketing Cloud, and ExactTarget Marketing Cloud.²¹³</p> <p>On information and belief, the metadata defines both unique and common aspects and functions of</p>

²¹² Dreamforce Video: "How Salesforce.com R&D Delivers the Cloud" (<http://www.youtube.com/watch?v=oc--Ki9bykU>) at 1:59

²¹³ http://wiki.developerforce.com/page/An_Introduction_to_Force.com_Metadata: "Metadata and Metadata API - How Metadata Defines Your Applications"; Force.com: A Comprehensive Look at the World's Premier Cloud-Computing Platform at 7.

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<p>Asserted Claims and Limitations</p>	<p>Corresponding Elements in Accused Instrumentalities</p>
	<p>both third-party and Salesforce applications, such as Sales Cloud, Service Cloud, Marketing Cloud, and ExactTarget Marketing Cloud.</p> <div data-bbox="1045 509 1438 1266"> <pre> graph TD subgraph WebBrowser [Web Browser] PA[Polymorphic Application] end RE((Runtime engine)) subgraph SharedDatabase [Shared Database] TSM[Tenant-Specific Metadata] CM[Common Metadata] D[Data] end PA <--> RE RE <--> SharedDatabase </pre> </div> <p>Figure 14B: Metadata Driven Architecture²¹⁴</p>

²¹⁴ Force.com: A Comprehensive Look at the World’s Premier Cloud-Computing Platform at 7.

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Asserted Claims and Limitations	Corresponding Elements in Accused Instrumentalities
	The metadata driven architecture of the Salesforce1 and Force.com platform allows modifications or customizations to applications through non-blocking updates to the corresponding metadata. When a user works with the application, Force.com's runtime application generator uses metadata to render the application components in the interface. ²¹⁵
21-5 automatically detecting changes that affect a particular application; and	<p>The Salesforce1 platform automatically detects and incorporates changes to a Salesforce product, including Sales Cloud, Service Cloud, Marketing Cloud, and ExactTarget Marketing Cloud and/or a third-party application and is an embodiment of <u>automatically detecting changes that affect a particular application</u>.</p> <p>An administrator user can make real-time customizations to Sales Cloud, Service Cloud, Marketing Cloud, and ExactTarget Marketing Cloud through the product's user interface.²¹⁶ The changes are incorporated into the product in real time and are detected automatically by the Salesforce1 platform.</p> <p>The Force.com change management (e.g., a developer sandbox) is an embodiment of <u>automatically detecting changes that affect a particular application</u>.²¹⁷</p> <p>A developer sandbox is a single development environment used to isolate development and testing.²¹⁸ A developer sandbox tracks changes made to a specific production by performing a sandbox refresh.²¹⁹ The Force.com platform provides an environment for applications and data during development, called an "organization" or "org." A developer sandbox is a "sandbox org."²²⁰</p>

²¹⁵ *Id.*

²¹⁶ *See*, Figures 7A-8

²¹⁷ Reference [1], page 11, paragraph 1

²¹⁸ Reference [2], pages 2-6, 11, 22-23

²¹⁹ Reference [2], page 21, paragraph 4

²²⁰ [http://wiki.developerforce.com/page/An_Introduction_to_Force.com_Metadata: "Organizations and Moving Metadata"](http://wiki.developerforce.com/page/An_Introduction_to_Force.com_Metadata:_Organizations_and_Moving_Metadata)

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Asserted Claims and Limitations	Corresponding Elements in Accused Instrumentalities
	<p>A change process established for a production may be used to track changes.²²¹</p> <p>The Force.com Migration Tool tracks changes using scripts.²²² The Force.com integrated development environment (IDE) can also track and synchronize changes.²²³</p> <p>Real-time changes to a third-party application developed and deployed on the Salesforce1 platform are an embodiment of <u>automatically detecting changes that affect a particular application</u>.</p> <p>An administrator user is able to make real-time changes (e.g., contextual actions) to a third-party application developed and deployed on the Salesforce1 platform using the "publisher" tool. An administrator user can add a custom action to the "publisher" area of a third-party application, save the change, and refresh the application. The Salesforce1 platform then automatically incorporates the changes in both the desktop version and the mobile version of the application in real time.²²⁴</p>

²²¹ Reference [2], pages 21-22

²²² Reference [2], pages 22-23

²²³ Reference [2], pages 18-19

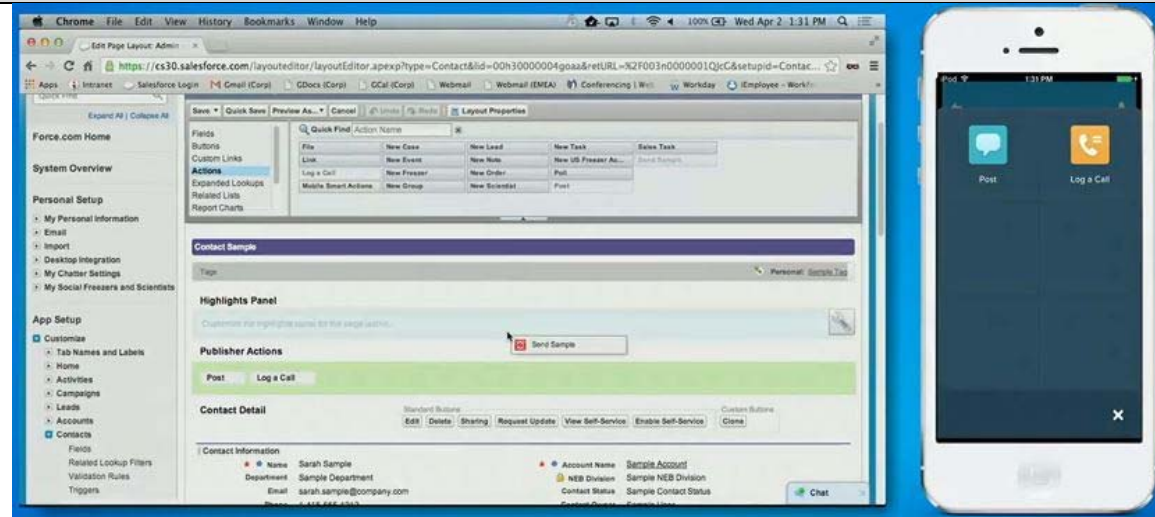
²²⁴ Salesforce Video: "Salesforce1 Platform: Building Next Generation Apps, IT and Devices - Salesforce1 World Tour Boston" (<http://www.youtube.com/watch?v=AJJOHXZi3Mg>) at 24:02-26:37

INITIAL DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS PURSUANT TO LOCAL RULE 16.1-6

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Corresponding Elements in Accused Instrumentalities

Figure 15A. Adding a Custom Action to the "Publisher" Area of a Third-Party Application²²⁵²²⁵ *Id.* at 25:15.

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Asserted Claims and Limitations

Corresponding Elements in Accused Instrumentalities

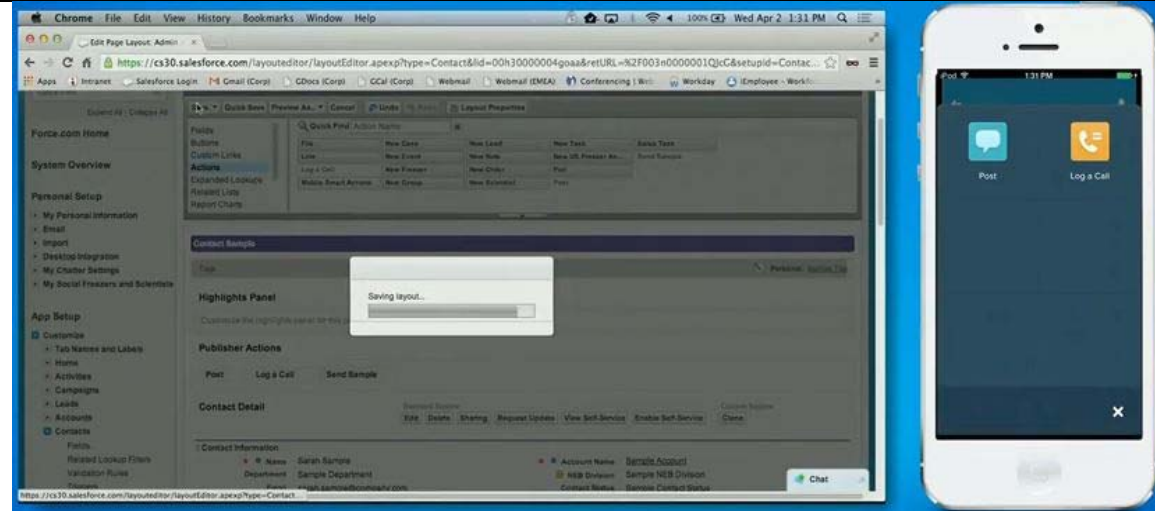
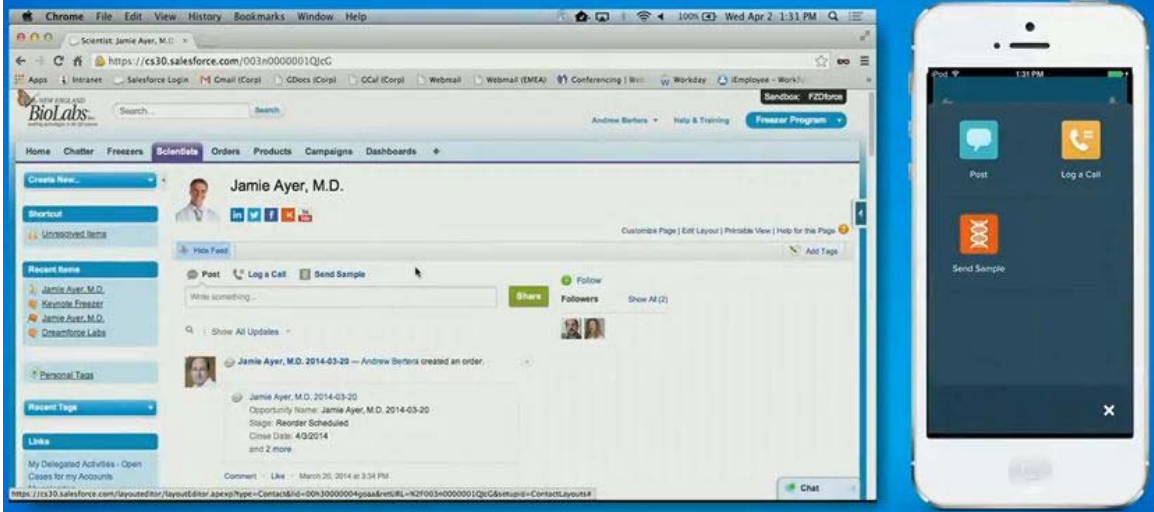


Figure 15B. Saving a Custom Action Added to the "Publisher" Area of a Third-Party Application²²⁶

²²⁶ *Id.* at 25:19

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Asserted Claims and Limitations	Corresponding Elements in Accused Instrumentalities
	 <p>Figure 15C. Refreshing a Third-Party Application to Incorporate a Custom Action²²⁷</p>
<p>21-6 distributing the user interface and functionality of the particular application to the client computer wherein the particular application and its user interface are dynamically re-generated each time a</p>	<p>When a third-party or Salesforce employee end user requests access to the Salesforce servers hosting a Salesforce or third-party application with a web browser, it is an embodiment of <u>distributing the user interface and functionality of the particular application to the client computer wherein the particular application and its user interface are dynamically re-generated each time a client establishes a connection with the server computer.</u></p> <p>A Salesforce product, including Sales Cloud, Service Cloud, Marketing Cloud, and ExactTarget Marketing Cloud, has a web-based form where the product can be access through a web-based user interface.²²⁸ The product can be accessed from a web browser on a user client computer connected to</p>

²²⁷ *Id.* at 25:53

²²⁸ *See*, Figures 1-4B

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Asserted Claims and Limitations	Corresponding Elements in Accused Instrumentalities
client establishes a connection with the server computer.	<p>a Salesforce server,²²⁹ and the user interface and the functionalities of the product are distributed to the web browser and dynamically generated (e.g., dynamic web pages) each time the client computer and server computer establish a connection.</p> <p>Third-party web-based applications may be developed on the Force.com platform or the Salesforce1 platform.²³⁰ A web-based application may be published and delivered to its users through the Site.com platform.²³¹ A public web application may be published on a public website using Force.com Sites.²³²</p> <p>When a Force.com platform or Salesforce1 platform user accesses a third-party web-based application through a web browser executing on user's client, the user interface and the functionalities (e.g., app logic or web page content) of the web-based application are distributed to the web browser and dynamically generated (e.g., dynamic web pages) each time the client computer and server computer establish a connection.²³³</p> <p>The metadata driven architecture of the Salesforce1 and Force.com platform allows modifications or customizations to applications through non-blocking updates to the corresponding metadata. When a user works with the application, Force.com's runtime application generator uses metadata to render the application components in the interface.²³⁴</p>
23. The method of claim 21,	Salesforce directly and indirectly infringes Claim 23 of the '482 patent. See discussion in connection with Claim 21.

²²⁹ See, Figures 10-11B

²³⁰ <http://wiki.developerforce.com/page/Websites>

²³¹ <http://wiki.developerforce.com/page/Site.com>

²³² <http://wiki.developerforce.com/page/Sites>

²³³ See, e.g., Fig. 15A-15C.

²³⁴ Force.com: A Comprehensive Look at the World's Premier Cloud-Computing Platform at 7.

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Asserted Claims and Limitations	Corresponding Elements in Accused Instrumentalities
23-1 wherein the first layer comprises a business content database having data about one or more different predetermined business applications.	<p>The Force.com Database is an embodiment of <u>a business content database having data about one or more different predetermined business applications</u>.</p> <p>The Force.com Database is a cloud-based database that is the backbone of the Salesforce1 platform, currently supporting more than four million applications.²³⁵ Features of the database include application data persistence, drag-and-drop tools, automatic user interface generation, pre-built components, and pre-designed templates.²³⁶</p> <p>The Force.com Setup menu is a declarative web interface for creating database objects and configuring other aspects of the platform.²³⁷ The declarative web interface, called the Force.com builder, allows user to create objects and fields generating the native application user interface around them.²³⁸ The interface creates metadata, which is used to generate a default user interface for each user-created database object.²³⁹</p>
24. The method of claim 23,	Salesforce directly and indirectly infringes Claim 24 of the '482 patent. See discussion in connection with Claims 21 and 23.
24-1 wherein the data further comprises one or more of business	Relationships exist among the database objects stored in the Force.com Database. ²⁴⁰ Additional features of the database include formulas, validation, triggers, labels, notes and attachments, track field history, etc. ²⁴¹

²³⁵ <http://wiki.developerforce.com/page/Database>; <http://www.salesforce.com/platform/database>

²³⁶ <http://www.salesforce.com/platform/services>: "Cloud Database"; http://wiki.developerforce.com/page/An_Introduction_to_Force_Database

²³⁷ http://wiki.developerforce.com/page/An_Introduction_to_Force_Database: "Using Data Services with Force.com Builder"

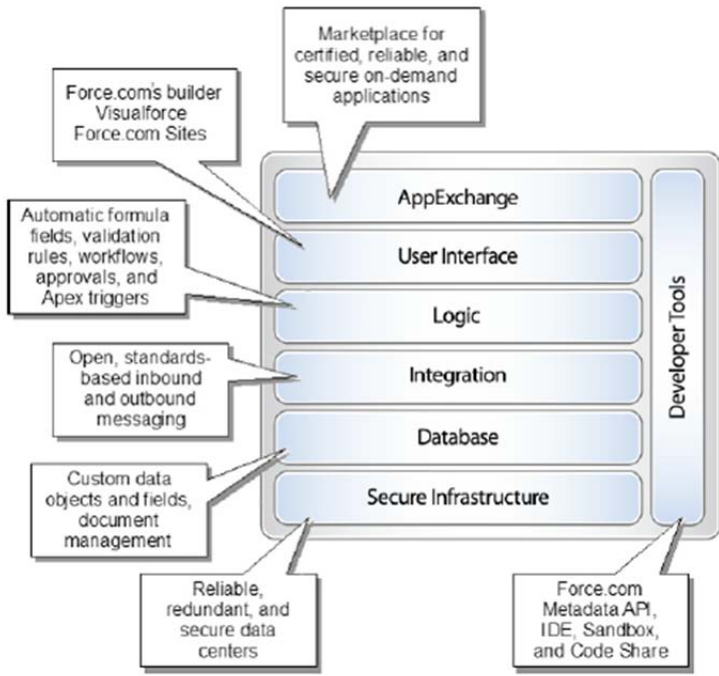
²³⁸ Abhinav Gupta & Ankit Arora, *Force.com Tips and Tricks* (2013), chapters 1 & 3

²³⁹ http://wiki.developerforce.com/page/An_Introduction_to_Force_Database: "Using Data Services with Force.com Builder"

²⁴⁰ http://wiki.developerforce.com/page/An_Introduction_to_Force_Database: "Database Services Fundamentals"; *see also*, <http://www.salesforce.com/platform/database>

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Asserted Claims and Limitations	Corresponding Elements in Accused Instrumentalities
<p>knowledge, logical designs, physical designs, physical structures and relationships associated with the predetermined business application.</p>	<p>The Force.com database builds on the foundation of the Force.com infrastructure to provide much of the platform's development power. Here you can create metadata that describes an application's custom database objects such as tables and fields.²⁴²</p>  <p>Figure 16: Force.com Stack Overview²⁴³</p>

²⁴¹ http://wiki.developerforce.com/page/An_Introduction_to_Force_Database; "Other Database Services"; http://wiki.developerforce.com/page/Build_Your_Cloud_Database

²⁴² Force.com: A Comprehensive Look at the World's Premier Cloud-Computing Platform at 8-10.

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Asserted Claims and Limitations	Corresponding Elements in Accused Instrumentalities
25. The method of claim 23,	Salesforce directly and indirectly infringes Claim 25 of the '482 patent. See discussion in connection with Claims 21 and 23.
25-1 wherein the second layer comprises a metadata database comprising data about the structures and functions associated with any application.	<p>The Force.com Database is an embodiment of <u>a metadata database comprising data about the structures and functions associated with any application.</u></p> <p>The Force.com platform and Salesforce1 platform provide a metadata model and metadata API. Platform metadata describes applications developed on the Force.com platform and the API encompasses a set of methods that provide programmatic access to the configuration and source of the applications.²⁴⁴</p>
26. The method of claim 25,	Salesforce directly and indirectly infringes Claim 26 of the '482 patent. See discussion in connection with Claims 21, 23, and 25.
26-1 wherein the metadata database further comprises data about the user interface including one or more of tools, worklists, data entry forms, reports, documents, processes, formulas and images.	On the Force.com platform and Salesforce1 platform, metadata defines a rich set of components including all aspects of Force.com functionality, from the appearance of user interfaces through workflow. Examples of components of metadata include custom user interfaces created using Visualforce, generated page layouts, and Apex classes for custom application functionality. Just about every aspect of an application developed on the Force.com platform, ranging from workflows to the configuration of database objects that store data, is metadata. ²⁴⁵
30. The method of claim	Salesforce directly and indirectly infringes Claim 30 of the '482 patent. See discussion in connection

²⁴³ *Id.* at 8.

²⁴⁴ http://wiki.developerforce.com/page/An_Introduction_to_Force.com_Metadata

²⁴⁵ http://wiki.developerforce.com/page/An_Introduction_to_Force.com_Metadata: "Metadata and the Metadata API"; *see also*, Figure 13

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Asserted Claims and Limitations	Corresponding Elements in Accused Instrumentalities
21	with Claim 21.
30-1 further comprising permitting a user to build a user interface for a particular application using the second layer.	<p>Visualforce of the Force.com platform and Salesforce1 platform is an embodiment of <u>a builder module for permitting a user to build a user interface for a particular application using the second layer</u>.</p> <p>Custom user interfaces for applications development on the Force.com platform and Salesforce1 platform may be constructed using Visualforce.²⁴⁶</p> <p>On information and belief, the drag-and-drop studio of the Site.com platform an embodiment of <u>a builder module for permitting a user to build a user interface for a particular application using the second layer</u>. Web pages can be constructed using the drag-and-drop studio.²⁴⁷</p>
40. The method of claim 21	Salesforce directly and indirectly infringes Claim 40 of the '482 patent. See discussion in connection with Claim 21.
40-1 further comprising distributing the first and second layers across one or more server computers.	<p>Data and metadata associated applications developed on the Force.com platform and Salesforce1 platform, including app logic and user interfaces, are stored in the Force.com Database, which is hosted on one or more servers associated with the Force.com platform.</p> <p>Salesforce has several data centers around the world for hosting the Salesforce cloud,²⁴⁸ which includes the Force.com platform, the Salesforce1 platform, Sales Cloud, Service Cloud, Marketing Cloud, and ExactTarget Marketing Cloud.</p>

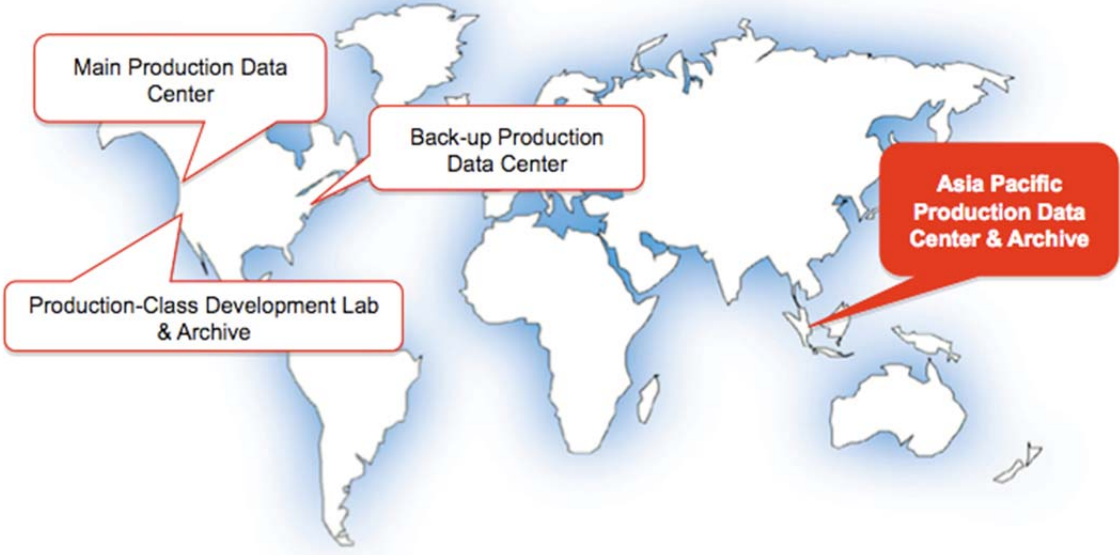
²⁴⁶ http://wiki.developerforce.com/page/User_Interface; http://wiki.developerforce.com/page/Visualforce:_An_Overview

²⁴⁷ <http://www.site.com/features>: "Design the next big thing - Drag-and-drop studio"


²⁴⁸ http://www.salesforce.com/ap/company/sustainability/data_center_operations.jsp; <http://www.salesforce.com/ap/company/sustainability/operations.jsp>: "Data center operations"; http://www.salesforce.com/us/developer/docs/api/Content/sforce_api_om_outboundmessaging_security.htm; *see also*, Figure 10

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Asserted Claims and Limitations	Corresponding Elements in Accused Instrumentalities
	 <p>Figure 17. Salesforce Data Center Locations²⁴⁹</p>

²⁴⁹ <https://success.salesforce.com/ideaView?id=087300000006ntCAAQ>

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Asserted Claims and Limitations	Corresponding Elements in Accused Instrumentalities
	 <p>Figure 18. Salesforce Fully Mirrored Cloud Infrastructure²⁵⁰</p> <p>Each data center has multiple pods, and each Salesforce organization is serviced by a pod.²⁵¹ Each data center includes a number of application and storage servers.²⁵²</p>

²⁵⁰ Dreamforce Video: "Salesforce Platform: Cloud Confidence - A Virtual Tour of Salesforce Data Centers" (<http://www.youtube.com/watch?v=HhGkGJz5iKQ>) at 6:05

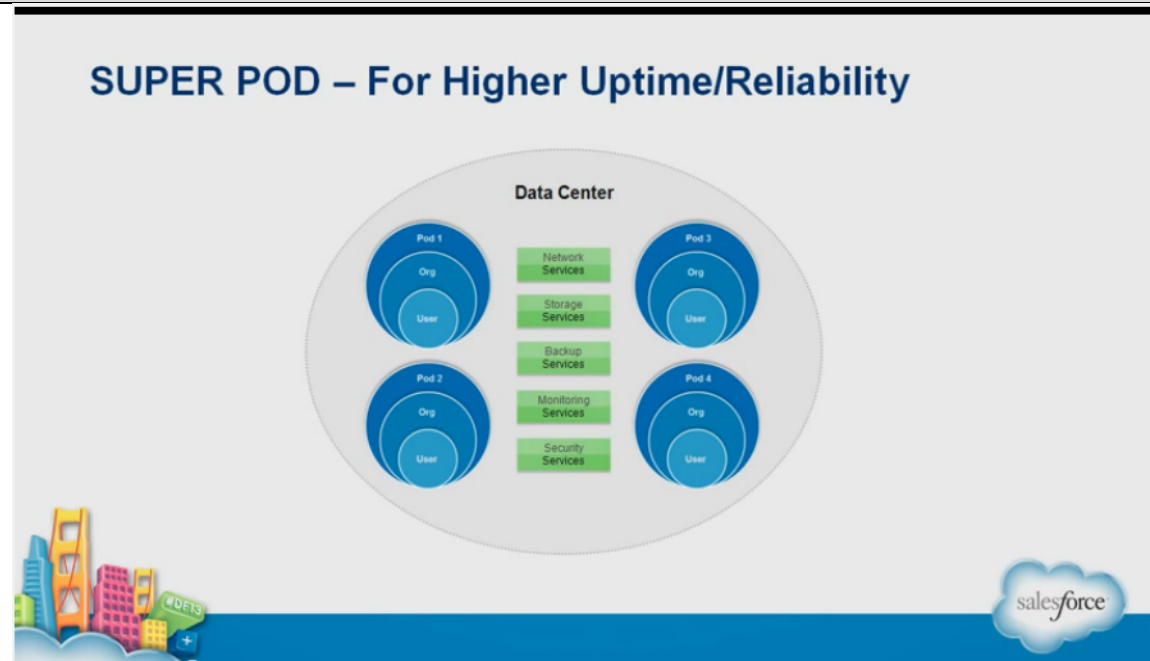
²⁵¹ *Id.* at 8:16-9:33

²⁵² *See*, Figures 19A-19B

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Limitations

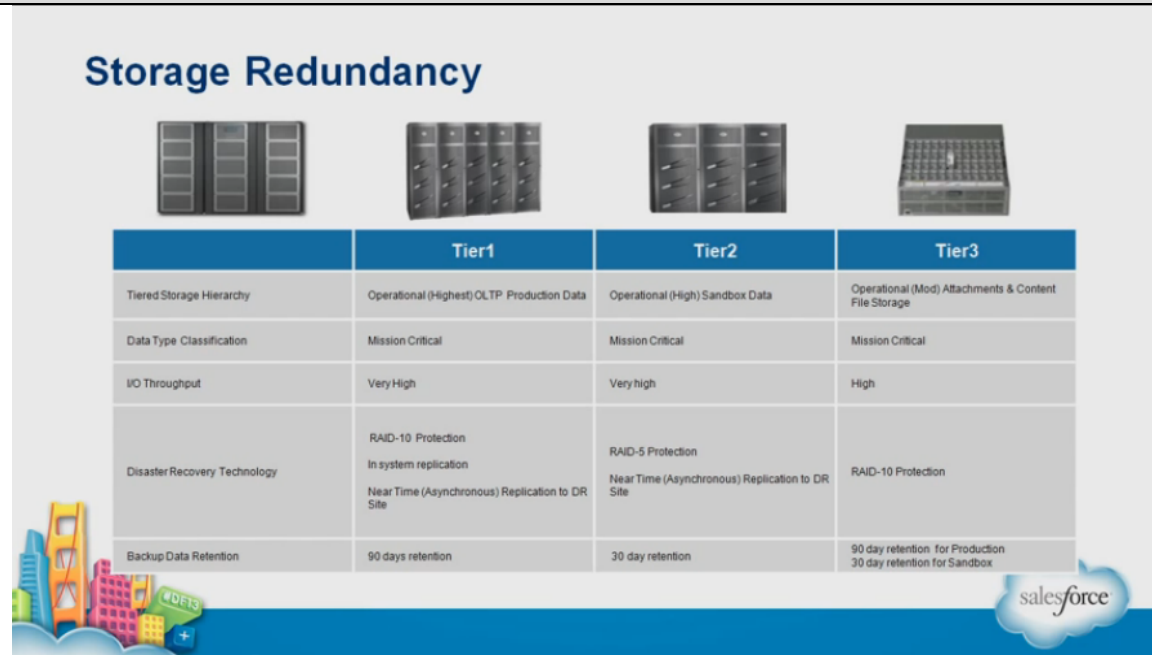
Corresponding Elements in Accused Instrumentalities

Figure 19. PODs of a Salesforce Data Center²⁵³²⁵³ *Id.* at 8:17

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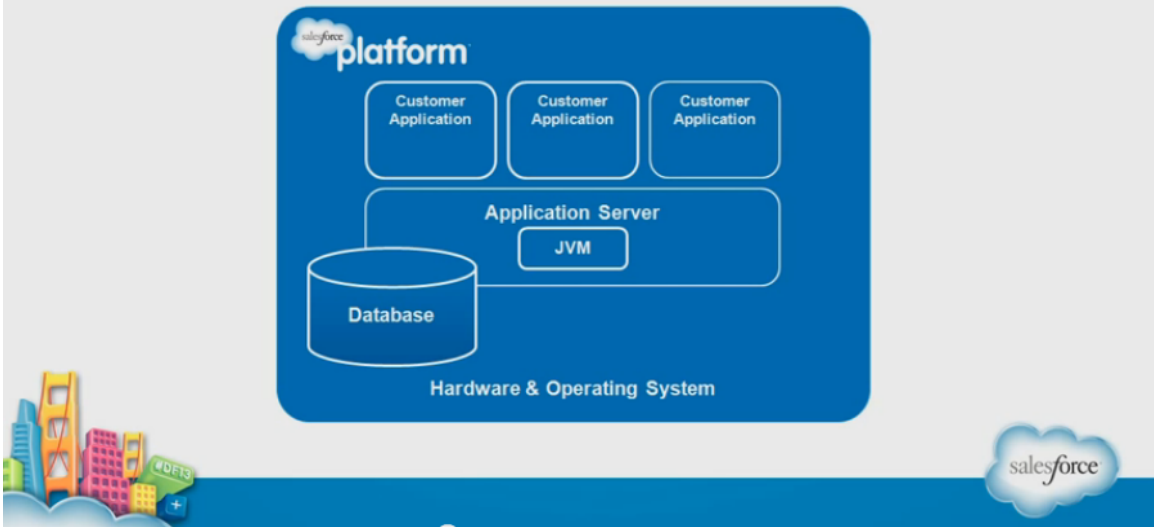
U.S. PATENT NO. 7,356,482 - *APPLICATIONS IN INTERNET TIME, LLC v. SALESFORCE.COM, INC.*Asserted Claims and
Limitations

Corresponding Elements in Accused Instrumentalities

Figure 20A. Storage of a Salesforce Data Center²⁵⁴²⁵⁴ *Id.* at 11:33

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Asserted Claims and Limitations	Corresponding Elements in Accused Instrumentalities
	<p data-bbox="743 467 1507 509">Improvement for ONE → Benefits to ALL</p>  <p data-bbox="842 1084 1638 1127">Figure 20B. Application Server of a Salesforce Data Center²⁵⁵</p>

ADDITIONAL REFERENCES

- [1]. Force.com: A Comprehensive Look at the World's Premier Cloud-computing Platform
 (http://www.developerforce.com/media/Forcedotcom_Whitepaper/WP_Forcedotcom-InDepth_040709_WEB.pdf)

²⁵⁵ *Id.* at 21:30

- [2]. Development Lifecycle Guide, version 14, 14 March 2014
(http://www.salesforce.com/us/developer/docs/dev_lifecycle/salesforce_development_lifecycle.pdf)